

**From:** [Sue Davies](#)  
**To:** [Northampton Gateway:](#) [REDACTED]  
**Subject:** Northampton Gateway Rail Freight Interchange TR050006 Objection  
**Date:** 22 September 2022 00:18:39  
**Attachments:** [AOMA - A45 London Road.pdf](#)

---

I am writing to express my objection to the proposed amendment requested by Segro to the original DCO granted in October 2019 for the Northampton Rail Freight Interchange. TR050006.

The original DCO was based on a simulation of future traffic impact and volumes. Of course the problem with simulations is often the basic assumptions and inputs. **This change of plan would devalue the relevance of the original simulation and makes a further assessment necessary.**

The original plan should not form the basis for the argument that there will be less traffic under the proposed request for change - It would be misguided to presume that road traffic volumes will be less because the rail interchange is not operational when the basic operating model is completely different.

The DCO, which was based on indeterminate data of assumed capacity, estimates, variables, unknowns and referencing 2010 data, was in fact inaccurate and we are now experiencing a reality that bears no resemblance to the predicted outcome.

The DCO consent was based on a modal shift from road to rail with terms that were different to any other RFI, specifically "that no occupations can occur prior to the rail terminal being operational." The model was rail-served warehousing with an opening year development proposal using around 20% warehousing increasing yearly 20% over 5yr period.

It was known by Segro at the DCO stage that there was a risk that the RFI would not be operational before 2024.

The change request would enable the NGRFI to use much more warehousing on a road -served basis for **an undetermined length of time**. This is unacceptable.

**The amendment goes against National Infrastructure Planning and the Government's policy of a modal shift from road to rail.**

It does not realise the 'greater good of the nation' benefits whilst local communities are already suffering significant increases in traffic, pollution, noise, loss of quality of life, a risk to health and increased health care costs and the development is not even operational yet!

The DCO was based on freight being delivered by rail and redistributed by road.

The change request is based on freight being delivered **and** redistributed by road (twice as many vehicle movements for a larger number of warehouses).

**This is a material change which will impact on local people and the environment**

The applicant has not included any delivery plans/trip rates -types long haul/short haul, even though the applicant now knows who interested parties are (?Amazon).

Since the DCO was granted it is now known that;

Pandemic - Market demand - re-emergence of the typical parcel type operation - light weight commodities such as parcels, chilled food (Tesco), Amazon. Therefore a greater demand to operate from a warehouse using multiple vehicles rather than HGVs. The change of plan provides data for HGVs and cars (based on what? A rail-served operation) the data does not include vans (likely to be used by Amazon) (light vehicle numbers relate to employee cars only).

Brexit - 'Just in time' ordering is more unreliable – there's more demand to operate from a warehouse with a greater number of vehicles.

Employment - Shortage of HGV drivers ie Availability of van drivers greater.

Fuel cost increase - Likely occupiers would be non-rail freight warehouse operators simply moving nearer to the M1.

We know that other RFIs who operated on a road to road basis initially have **NOT** moved completely from road to rail.

**This impacts massively on vehicle movements and should justify the need for a new assessment.**

The original simulation determined that **a stretch of road already designated an AQMA and NIA by DEFRA** on the A45 at Wootton (directly Eastbound from NGRFI) is not going to be adversely affected by the scale of the new development! Yet Highways have made massive changes to M1J15 to accommodate *increased traffic flows* along the A45.

The distribution centre estimates 36% of HGV movements generated by NGRFI would travel along the A45. These vehicles will travel through the AQMA/NIA at Wootton which directly borders the A45 close to J15.

**This contradictory assessment unquestionably devalues the accuracy of the data.**

See attached photos of the designated Air Quality Management Area/Noise Important Area.

All planning guidance stresses the importance of mitigating negative impact

from a development that decreases air quality/increases noise and that mitigation should be location specific. This is more important where the impact is within an AQMA/NIA.

Yet no steps have been taken to mitigate this.

The number of HGVs on the road contributes significantly to overall air pollution. The WHO has classified diesel exhaust emissions as carcinogenic to humans.

**This goes against government policy on Air Quality Management and legal requirements**

**This goes against government policy to reduce environmental noise**

**These are legally-defined objectives - mitigating action should be taken *before* any additional traffic uses the AQMA/NIA stretch of road between J15 and the Queen Eleanor roundabout.**

ie Low noise road surface, noise/safety barriers, a reduction in speed limit from 70 to 50mph, speed monitoring system, noise and pollution monitoring system.

This is a major issue for residents and the effect on their health and well being leading to a reduced quality of life and increased health care costs. There is a legal obligation to reduce noise, CO2 and NO2 levels in this area.

**This amendment is a material change. It significantly changes Segro modus operandi. The information provided in the application is out of date and incorrect. A new transport and environmental assessment is needed before any decision is made, especially given the unquestionable negative impact on residents around the Wootton AQMA/NIA.**

If Segro is allowed this amendment it will set a precedent for developers to adopt the same approach – ignoring original commitments, bypassing local planning, going against government policy and putting developer profit before the health and well being of people increasing health care costs.

Please reject this amendment and ensure the original DCO is complied with.

Thank you

Sue Davies

[REDACTED]

[REDACTED]

[REDACTED]



Offices

Sports Ground  
Wootton Hall Park

© Crown Copyright 2008  
Licence Number: 10019655

Sports Field

School

Garden Centre

Allot Gdn

Allot Gdn

WOOTTON CP

98m

89m

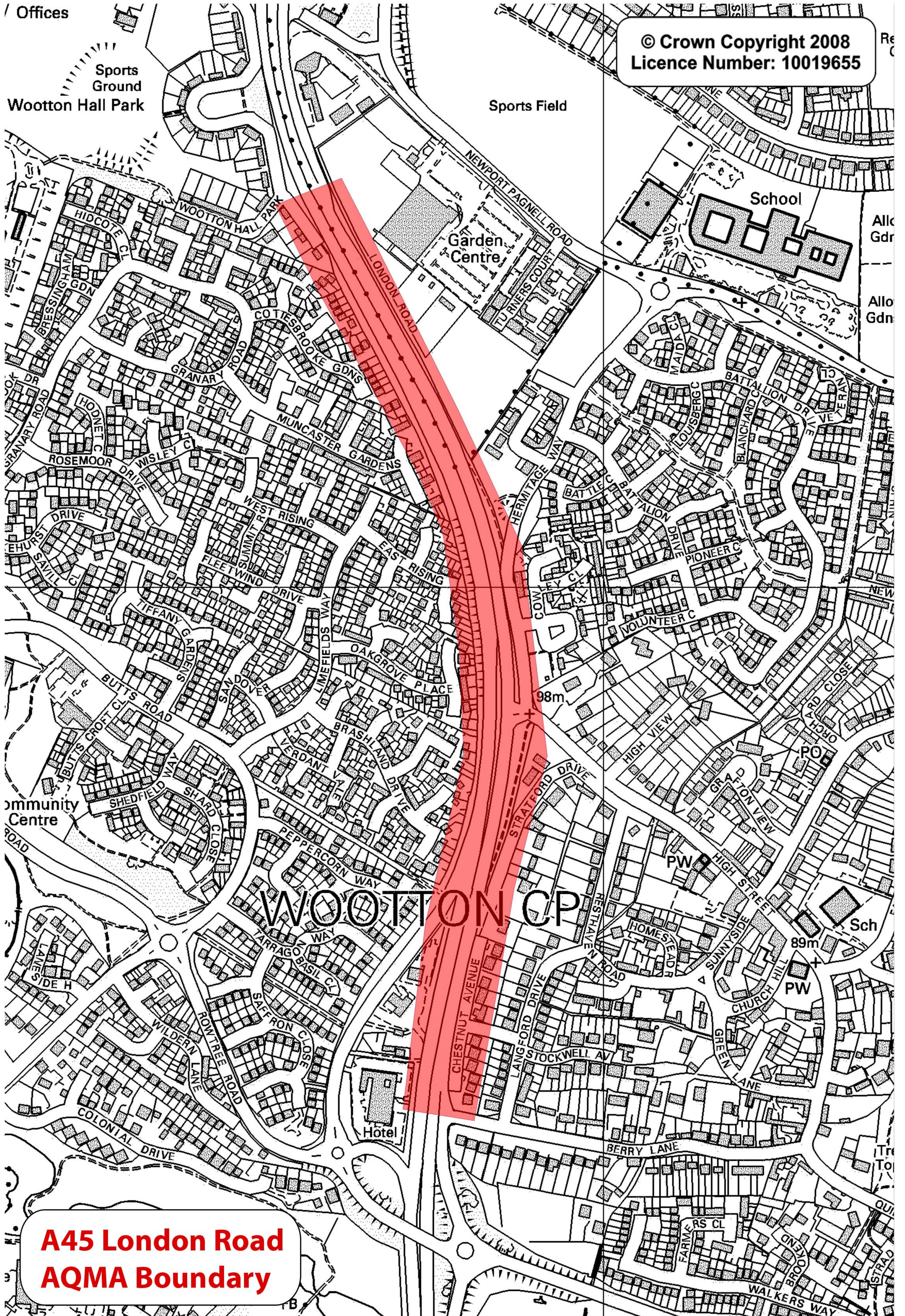
Sch

PW

PW

Hotel

**A45 London Road  
AQMA Boundary**





A45  
Wootton  
to M1



Bridge over  
A45









