

From: [REDACTED]
To: [Northampton Gateway](#)
Cc: [REDACTED]
Subject: SEGRO NORTHAMPTON GATEWAY APPLICATION FOR AMENDMENTS TO THE DCO REGARDING OCCUPANCY OF WAREHOUSING PRIOR TO COMPLETION OF ALL RAIL CONNECTIONS
Date: 30 August 2022 19:37:55

RE: SEGRO NORTHAMPTON GATEWAY APPLICATION FOR AMENDMENTS TO THE DCO REGARDING OCCUPANCY OF WAREHOUSING PRIOR TO COMPLETION OF ALL RAIL CONNECTIONS

Dear Sirs,

I write to express my concerns and raise my objections to the application now being made by Segro on the Northampton Gateway scheme for changes to the DCO to allow the occupation of over 50% of warehousing prior to completion of the Rail connections.

The original scheme was for a total of 468,000 sq. m of warehousing the proposed amendment is for 232,260 sq. m of warehouse occupancy, however in Segro's supporting statement point 3.5, they indicate a 37% occupancy, this appears to be factually incorrect and requires clarification as the square meterage equates to circa 50%. Furthermore the proposed amendment application has been worded to potentially allow the occupancy levels to be raised by up to 80% via the Local planning system.

My initial concerns are how can this be considered a non-material amendment when potentially 80% of whole scheme it appears from the onset would become Road served from the offset and thus fails to comply with its original purpose for which planning was granted. Paragraph 9) of amendments to DCO state the simpler process for handling "non-material changes" reflects the fact that such changes do not raise issues requiring the same level of scrutiny as changes that are "material", clearly this is not the case and the utmost scrutiny will be necessary.

In this instance the proposal to allow potentially up to 80% of Road served warehousing occupancy prior to Rail Connections surely is in conflict with the original NSPNN 2008 policy which was to reduce pressures on the Road system, the original policies states:

Reference page 20, The need for development of Strategic rail freight interchanges

Para 2.44" The aim of SRFIs is to optimise the use of rail in the freight journey by maximising rail trunk haul and minimising some elements of the secondary distribution leg by road"

Para 4.88 Applications for a proposed SRFI should provide for a number of rail connected buildings from the initial take up....The initial stages of the development MUST provide an operational RAIL NETWORK CONNECTION and although not essential for all building to be rail connected from the offset but a SIGNIFICANT element should be.

Clearly an immediate 50% reduction in Rail served units is a substantial amount, coupled with the total uncertainty surrounding any potential Network Rail connections at all, clearly this does not represent a significant amount of Rail connected as mentioned in the above paragraph 4.88. Segro indicated in their present application that discussions with Network Rail were entered into as far back in 2017 regarding rail connections, if 5 years on there still remains uncertainty on any

rail connections and Segro have included the wording in their proposed DCO amendment *“unless otherwise agreed in writing with the relevant planning authority i.e. the DCO”* to potentially allow for further increases of up to 80% occupancy.

I am unsure of the Planning Inspectorate* Process for assessing this current application and would raise the following questions:

- Has the decision to accept this application as a non-material amendment already been agreed?
- Or, does the inspectorate now view the suite of information provided, await the public and stakeholders response and then make an assessment whether the application should potentially be a material amendment?

I am sure that the weight of public objections to this application will be quite substantial, and would request, if the process allows, that the Planning Inspectorate re consider the application as a “material amendment” given the potential implications it will have on all issues of environment such as increased road traffic, air quality, pollution, bear in mind that the original highways designs were never based on a higher volume potentially 80% road based use, therefore a full re appraisal should be carried out by an independent specialist other than those appointed by Segro, who suggest that a Road based warehousing scheme would actually reduce traffic levels.

Segro included the wording in the original DCO to 468,000 sq. m (EXCLUDING MEZZANINE) can you clarify, if the original permission actually stated excluding mezzanine? As during the early consultation process Roxhill indicated that all warehousing would be a maximum of 18 meters high. This has already been amended via the LPA and increased to circa 26 meters. Until last week the Segro website was still advertising units with eaves heights up to 30m high available for occupation in Q 4 2022. Clarification needs to be sought from Segro regarding the potential increase in warehouse square footage created by the addition of mezzanine levels i.e. planning was originally granted for 5 million square feet, will this now be exceeded? Clearly if this was the case common sense would suggest that an increase in warehouse capacity would in turn create an increase in road traffic.

Segro have cited the inability of Network Rail to guarantee the timing of mainline connections as the reason for the potential change to DCO, however I would argue that the actual reason is Segro’s desire to design and build (i.e. contract build) for clients now showing interest, rather than speculatively build brought about no doubt by the fact they are advertising units available for occupation Q4 2022. They indicate that build times for units are a minimum 15 months, so in reality if they spec built units would be unlikely to be completed much before Q1 2024, which could of course coincide with Rail connections.

Segro state *“That supply of deliverable high quality sites with Rail terminals is very limited and the sector continues to see high levels of demand”*, I would suggest therefore that a speculative build carries very little risk to a company of Segro’s size and stature, who of course knew from the offset potential issues with Network Rail.

In closing Segro entered into the original DCO agreement with the full knowledge of the potential issues surrounding Rail connectivity, and on face value it appears that the main reasons

for the proposed amendment is not actually Network Rail's inability to make main line connections but Segro's preference to "Contract Build "rather than speculate. I would appeal and urge the Planning Inspectorate to follow due process and refuse any amendment to the currently worded DCO.

I look forward to your response to my queries above and in particular with regards to the *planning process element of this e mail would be greatly appreciated.

Kind Regards,

Alan Hargreaves

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