

Dear Inspector,

Re: Northampton Gateway Rail Freight Interchange Project – Non-Material Change TR050006

The wording in paragraph 4.6 would permit up to 49.6% of the floorspace to be occupied before the rail terminal is operational. This is a greater proportion than any of the other approved SRFI's referred to in para 3.4. I suggest that if any proportion of the floorspace be permitted to be occupied in this manner then it should be no more than 25% of the total floorspace, as per the most recent of the other sites referred to. This would clearly demonstrate to the local population that the inspectorate is serious about ensuring that what they have granted permission for will be a strategic project.

Also in paragraph 4.6 The wording “unless otherwise agreed in writing with the relevant planning authority” should not be permitted, as it could be used to permit the full occupation of the site even if the rail terminal was for whatever reason never made operational. This would leave the door open to the possibility of a SRFI being granted permission by central government, but in the end just being yet another road served site.

Paragraph 5.5 and 5.6 use the East Midlands Gateway as an example where buildings were operational prior to the rail terminal becoming operational. However I believe the situation with Northampton Gateway RFI is different in that the timing of when the rail terminal will be operational is still unknown and may still be unknown when operators are making their commitments to occupy. As such, I would assert that it is more likely in this scenario that operators who commit prior knowing the timescale for the rail terminal being operational are more likely to be ones which have little or no real interest in utilising the rail terminal. This invalidates the argument that the example of what happened at EMG is sufficiently similar to be able to have confidence that the same thing will happen at Northampton Gateway. There remains the possibility then that early occupiers are more likely to have less interest in utilising rail than if occupation were only permitted after the rail terminal was operational. This would then have a knock on effect of increasing the road traffic serving the site, as goods for these operators would be both arriving and departing by road.

Para 5.7 states “there is no evidence or expectation that this delay will deter or prevent adoption of rail freight once it is available”. What it is unable to say is that there is no evidence that permitting occupation prior to us even knowing the timescale of the rail terminal being operational will have no effect on the long term use of rail freight by the initial occupiers of the site.

Para 5.18 claims that “there is no adverse impact on business and residents as a result of the change sought”. This appears to be on the basis of comparing the site operating at 50% occupation with only a road connection, to the site operating with the rail terminal fully functional. The correct comparison to make is that with and without the proposed change. With the change, local road traffic in the area will increase from the time of first occupation, whereas without it, the local road traffic will only increase at the point that the rail terminal is operational and the first occupations

can take place. There could therefore be several years of less traffic locally if the change is not permitted, which I contend means that this should be treated as a material change.

Yours faithfully

Charles Askew