



## Collingtree Parish Council

22<sup>nd</sup> September 2022

Sent via email to: [REDACTED]

The Rt. Hon. Anne-Marie Trevelyan MP  
Secretary of State for Transport  
Department of Transport  
Great Minster House  
33 Horseferry Road  
London  
SW1P 4DR

Dear Secretary of State

**Proposed amendment to Condition applied to DCO granted to Segro Ltd and Northampton Gateway SRFI – (Northampton Gateway Rai Freight Interchange Project – Non-Material Change TR050006)**

The proposed change to the conditions governing the above development is currently undergoing a period of consultation ending on 26<sup>th</sup> September. Collingtree Parish Council wishes to comment and object strongly to the proposed change for the following reasons.

Collingtree Parish adjoins the Northampton Gateway site and our concerns were made clear in our submission to the Planning Inspectorate during the Public Examination in October 2018. There were many concerns but they centred principally on the Environmental Impact and therefore issues related to Air Quality and Traffic Assessments.

During the two-year Examination carried out by the Planning Inspectorate, the proposal was opposed strongly by many surrounding communities, parish councils, local authorities, two constituency MP's as well as environmental groups and rail transport specialists. Throughout Examination, the overriding justification for the proposal was that all the negative environmental impacts would be outweighed by the benefit of getting substantial amounts of freight off the road network and on to rail. The development was classed as a Strategic Rail Freight Interchange (SFRI) linked to the West Coast Mainline (WCML) thereby bypassing local planning - and was eventually granted a DCO by the Secretary of State for Transport. However, this was conditional upon the site being connected to WCML prior to any occupancy.

The groundwork for the site is now well advanced but because Segro has been unable to obtain firm commitments from Network Rail for connection to the WCML, this change to the DCO condition has been applied for. The applicant states that this is a non-material change that does not affect the fundamentals of the overall scheme or the basis of the DCO. We understand that it is for the Secretary of State to decide

what is or is not material and that this may depend on whether the change might require an updated Environmental Statement or result in a substantial impact on local residents and businesses. We believe that the implications of the proposed change would be in conflict with the original assumptions on which Northampton Gateway was approved and would have environmental impacts on local residents.

The applicant wishes to reword the condition to allow 37% of the total space to be occupied before mainline rail connection. However, as the original consent was for a scheme of 468,000 sq.m of warehousing and the application is for 232,260 sq.m to be occupied without restriction, this would be a substantial increase of 50%. The applicant is also seeking to change the wording of the current DCO to allow further increases of permitted occupancy of up to 80%, should the rail connection be delayed further. This change would avoid the need for a full DCO application and would simply need to be 'agreed in writing by the relevant planning authority'.

We have concerns that the eventual storage capacity of Northampton may be greater than originally understood. Although the DCO provides for 468,000 sq.m of warehouse space, it excludes from that figure Mezzanine floor levels within the warehouse units. The trend in warehouse design is for greater use of mezzanine floors thereby increasing storage capacity many times. The applicant has already increased the height of units (via the Local Planning Authority) from the original 18 meters maximum to around 26 meters. The applicant is also currently marketing units with eave heights of up to 30 meters. This combination of increased heights and mezzanine floors will potentially increase total capacity and therefore the number of HGV's servicing the site. The intentions of the DCO need greater clarification on this aspect.

The National Policy Statement for National Networks (NSPNN) sets the framework for the development of SRFI's and states in Para 2.44 that 'the aim of SRFI's 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"* in Para 4.88 the NSPNN states *"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"*

It is hard to see how either of these requirements would be met if the proposed amendment is approved.

The major concern of the Parish Council regarding Northampton Gateway has been the Environmental Impact on local communities, particularly Air Quality but also Noise from the HGV traffic generated. There is a continuing lack of adequate Air and Noise monitoring from the Local Authority despite the Northampton Gateway adjoining an AQMA. Therefore, at the very least, any changes that affect the predicted volumes and patterns of HGV traffic should be rigorously re-examined in a full independent Traffic Assessment.

Collingtree Parish was one of 30 Parish Councils in this region (Parishes Against Pollution) that during the Examination, submitted a signed joint declaration urging that the principle set out in the National Planning Policy *'that new developments should not adversely affect levels of soil, air, water and noise pollution'* should be fully adhered to.

Along with other parish councils we find it extraordinary that after months of exhaustive examination, hearings and reports, the whole basis of the SFRI proposal i.e. the connection with the WCML, has not been

agreed. Network Rail remained non-committal throughout the Examination including in correspondence as early as 2017 with Andrea Leadsom MP. This was the case when the DCO was granted and is still the case. Segro says in its Application Statement, that it has, or soon will, complete the onsite rail infrastructure needed (sidings/rail tunnel etc). However, until this infrastructure is actually connected to WCML, it is irrelevant.

### **Conclusion**

Collingtree Parish Council continues to be concerned about the environmental impact of Northampton Gateway and believe that the proposed change to the occupancy condition on the DCO is a 'material' factor that could affect calculations of HGV traffic generation and also undermine the original intentions of the SFRI for which the DCO was granted. We believe that unless:

- a) Network Rail commit to a firm date and timetable for connection to WCML or
- b) There is a full and independent revision of Traffic & Environmental Assessments and Statements.

This proposed amendment to the DCO should be refused.

Yours sincerely

**Collingtree Parish Council**

CC: Rt Hon Andrea Leadsom, MP – South Northamptonshire

CC: Steve Parker – Planning Inspectorate

CC: Northampton Planning Inspectorate

CC: WNC - Lizzy Bowen

CC: WNC - Phil Larratt

CC: WNC - Jonathan Nunn

CC: Clerk Roade Parish Council

CC: Clerk Blisworth Parish Council

CC: Clerk Milton Malsor Parish Council

CC: Clerk Grange Park Parish Council

CC: Clerk Courteenhall Parish Council

CC: Clerk East Hunsbury Parish Council