



Date: 22/09/2022

The Right Honourable Anne-Marie Trevelyan MP
Secretary of State for transport
Department of Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Dear Mrs Trevelyan,

Ref: **Objection to Northampton Gateway Rail Freight Interchange Project – Non-Material Change TR050006**

Blisworth Parish Council discussed the application to amend the Northampton Gateway DCO (see reference above) and called a public meeting in Blisworth Village Hall to gauge opinion on the matter. The public meeting was enthusiastically attended, leaving standing room only. In addition, some of Blisworth's parish councillors and local people met with SEGRO's representatives at their request to ensure we had as full as possible an understanding of the application. This response has been produced after careful consideration of the documents supporting the application posted on the HM Planning Inspectorate (HMPI) website, ascertaining the views of local people, discussion at full Parish Council meeting and the meeting with SEGRO.

Blisworth Parish Council **strongly object** to the application and urge HMPI to completely reject it. In addition, we consider the application to be a fundamental change to the rationale behind the development and therefore not "non-material". If not rejected immediately, we ask HMPI to apply the full public scrutiny process to the application so that the matter can be properly tested and all the issues thoroughly examined.

Our objections to the application are summarised as follows:

1. At the time of the public examination of the proposed Strategic Rail Freight Interchange (SRFI) many local people suspected that the rail connection, that made the project "strategic", was there simply to gain permission to build warehouses on the west side of the M1 that otherwise would not have been allowed under the (then) Northampton County Council planning policy. We believe that the condition attached to the DCO that prohibited any commercial activity till the rail connection was operational was to address this concern. If the developers had no firm commitment from Network Rail on when the SRFI could be connected to the railway, then they clearly proceeded speculatively in full knowledge of the DCO conditions. Therefore, the rationale behind the condition in the DCO prohibiting commercial operation before the rail link was operational is still valid and should not be changed.

2. SEGRO assert that commercial operation of a substantial proportion of the warehouse area without a railway connection will not result in increased HGV traffic. We believe this to be a questionable claim based as it is on global assumptions within their traffic assessment and fear that the real result will be more heavy traffic through our village, particularly when there are delays on the M1. Blisworth provides a “convenient” rat run for traffic bypassing the M1, J15 to J15A as well as from the A43. The traffic assessment provided by SEGRO (Appendix 9 to the SEGRO Supporting Statement) does not consider these impacts; it is only concerned with major highways. Treating the issue as “non-material” seems to avoid any rigorous examination of SEGRO’s claims. We note that West Northants Council (WNC) has made similar comment in their correspondence with SEGRO and reproduced in Appendix 3 of Appendix 9 to SEGRO’s Supporting Statement. Increased HGV traffic through the narrow streets of Blisworth is extremely undesirable from an environmental, safety and heritage point of view. Blisworth is a rural settlement of approx. 1000 buildings largely comprising a conservation area with several prominent listed buildings, of which many are situated alongside “trunk road bypass” routes through the village. The protection of Blisworth’s rural, visual, historic, and archaeological qualities is supported by a Local Plan. It was recognised by the Highways Authority and Northamptonshire County Council in 1995 that the village was unsuitable for HGV traffic when the village was bypassed creating the A43. During our meeting with SEGRO we understood that HGV traffic will be actively discouraged from turning right onto the A508 from the development (and hence from turning right again towards Blisworth); however, it is not clear how effective this will be, and it will not prevent HGV traffic entering Blisworth from the A43 to bypass the M1, J15A and J15. If the application is granted, we suggest that traffic signs are erected which prohibit Rail Terminal HGV traffic from using all routes that pass through Blisworth.
3. It appears to us that if the application is granted in the absence of any firm commitment and timescale for connection to the railway, further delays will inevitably give rise to applications for more and more of the warehouse space to be road connected only. This will undermine the very reason for government policy on shifting freight off the roads and onto the railway. The message to other warehouse developers will be clear: claim SFRI status at the outset to bypass local planning processes then claim rail connection problems and operate as a road served facility. In Blisworth we have recent memory of the “Rail Central” bid to build rail connected warehouses utilising all the land between Blisworth and Milton Malsor and adjoining Northampton Gateway. This application was withdrawn after vigorous local opposition, but we expect other developers to be monitoring the current situation closely to see if they too can use SEGRO’s strategy.
4. It seems clear to us from SEGRO’s application and from their advertising for tenants that their preferred strategy is for bespoke warehouses to be built, paid for by their customers, rather than be built speculatively by the developer itself. SEGRO could potentially bypass current difficulties if it continued to build speculatively. That would mean warehouses would not likely be available for occupation till well into 2024 and would give time for Network Rail to connect the facility. It seems therefore that it is SEGRO’s commercial strategy that is driving the need for the DCO

change now because they want to attract customers before construction. We do not consider that the DCO conditions should change just to suit SEGRO's commercial strategy when they have alternatives. If the rail connection cannot be made till after 2024, it will mean that over 5 years have passed since the start of construction; if a short "possession" of the railway to make a connection cannot be made in such a timeframe, we doubt it ever will. During our meeting with SEGRO, their representatives informed us that they had increasing confidence that the rail connection could be made in September 2023 and an Implementation Agreement with Network Rail would then put the matter on a firm contractual footing. In view of all this, we suggest the application is premature.

5. We note that SEGRO have applied for a "non-material" change to their DCO. We are aware there is no legal definition of what constitutes a "non-material" change but recent correspondence with HMPI indicates it is for the Secretary of State for Transport to make this decision and one of the factors is "where a change would result in an impact on local residents and businesses that would be sufficient to indicate the change should be considered material." We are concerned that the traffic issues will be significant. We also suggest that the Government strategy on developer led SFRIs seems to be undermined by this application; there are important national policy issues at stake for the relevant Secretary of State. We therefore suggest that a possible response to the application could be rejection of "non-material" status so that all the relevant local and national issues can be fully examined by HMPI.
6. We have noted that the draft amendment to the Development Consent Order (DCO) would not only allow for 232,260m² of warehouse space to be operated before the railway was connected but would also change two other important conditions. Firstly, the requirement for the rail connection to be capable of handling at least 4 intermodal trains per day, including 775m length trains, has also been removed. Secondly, any further relaxation of the conditions would be left for the "relevant Planning Authority", which we assume means the local Planning Authority. These changes are not justified in any way in SEGRO's Application Statement and appear to constitute a further unjustified watering down of the DCO conditions. During our meeting with SEGRO, they confirmed they would have no objection to the requirements on the numbers and lengths of trains to remain in the DCO.

Yours Sincerely



On behalf of Blisworth Parish Council: Cllr Stephen Billing, Chairman

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