

# The Rail Central Rail Freight Interchange

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## Northampton Gateway Examination

### Review of Northampton Gateway Document 8.22: Climate Change Summary

**Northampton Gateway PINS Reference Number  
TR050006**

**26 March 2019**

## RAIL CENTRAL – REVIEW OF DOCUMENT 8.22 CLIMATE CHANGE SUMMARY

- 1.1 Rail Central (RC) have reviewed Northampton Gateways (NG) submitted document 8.22 which summarises the proposed developments approach to meeting climate change in accordance with the National Policy Statement for National Networks (NPSNN) and the EIA Regulations (2017).
- 1.2 Following this review, RC maintain their firm view that neither this note, or the Environmental Statement (ES) submitted within the application meets the procedural or legal requirements of the NPSNN of EIA Regulations for the reasons as stated in previous correspondence.
- 1.3 RC agree with Paragraphs 1.4-15 of Document 8.22 which clearly presents the requirements of the EIA (2017) Regulations with respect to Climate Change. The ES in support of NG must therefore contain an assessment of the direct and indirect significant effects of NG upon the causes of climate change (greenhouse gas emissions) and the impacts of climate change upon NG (climate change adaptation).
- 1.4 Document 8.22 makes a number of references to the NG Design and Access Statement (Document 6.9) and the Sustainability Statement (Document 5.2) as evidence of the applicants consideration and assessment of climate change. These documents do not form part of the ES and therefore must be disregarded for the purposes of demonstrating compliance with the EIA (2017) Regulations.
- 1.5 Paragraph 2.7 of Document 8.22 states that Chapters 1 -15 of the ES does present an assessment “of the likely impacts of climate change on the proposed development and the impact of the proposed development on the climate”.
- 1.6 Paragraphs 2.21-2.48 explain that Chapters 7 (Water Resources and Drainage), Chapter 9 (Air Quality) and Chapter 12 (Transportation) provide the assessment of climate change in accordance with the EIA (2017) Regulations. RC disagree with this statement for the following reasons:
  - (a) Paragraphs 2.35 acknowledges that Chapter 7 (Air Quality) does not assess the carbon dioxide but rather Nitrogen Dioxide (NO<sub>2</sub>) and Particulates (PM<sub>10</sub>). RC agree with this statement given that the terms ‘carbon’ and ‘greenhouse gas’ are not mentioned once within the chapter nor is there a formal assessment of effects against this environmental topic.
  - (b) Paragraph 2.36 then attempts to conclude that NG would “*deliver a positive contribution*” to climate change by virtue of its function of an SRFI. This conclusion is not supported by any evidence nor is it in accordance with the EIA Regulations and therefore cannot supplement the deficiencies of Chapter 9 or the ES with regards to the assessment of greenhouse gas emissions. Document 8.22 is not published as an addendum to the ES and therefore this conclusion must be dismissed.
  - (c) Paragraphs 2.38 2.48 attempt to demonstrate that Chapter 12 (Transportation) has considered the GHG savings resulting from modal shift with paragraph 2.47 of the stating that the “*general impact on traffic terms can be summarised as a permanent beneficial impact of major significance with regards to traffic flows and congestion relief which are also of direct relevance to greenhouse gas emissions*”. Given that the statement underlined nor the term ‘greenhouse’ is contained within Chapter 12 and that Document 8.22 does not constitute an ES Addendum, this conclusion must be dismissed. RC’s previously submitted conclusions therefore remain valid that Chapter

12 does not meet the requirements of the EIA (2017) regulations with regards to the assessment of climate change.

- (d) Paragraphs 2.53- 2.58 of Document 8.22 appears to assess the cumulative impacts of NG and RC with respect to reductions in greenhouse gas emissions with paragraph 2.58 stating "*Therefore, combined the two SRFI's can reasonably be expected to deliver increased climate change related benefits to those seen by Northampton Gateway alone*" In the absence of any formal assessment supporting this conclusion within the submitted ES this statement must be dismissed.
- (e) With regards to climate change adaptation, RC's previously submitted objections also remain valid in that the ES submitted with the application for NG does not demonstrate an assessment (with significance criteria) of the future impacts of climate change upon NG and how mitigation may be used to reduce any significant effects with respect to climate change effects such as rising temperatures and overheating of buildings.

1.7 In summary, Document 8.22 does not constitute an addendum to the submitted ES and therefore any conclusions presented therein with respect to climate change must be dismissed. The NG ES remains does not comply with the requirements of the EIA (2017) regulations with respect to the assessment of climate change impacts.