

The Rail Central Rail Freight Interchange

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Northampton Gateway Examination

Deadline 9 Submissions on behalf of
Ashfield Land Management Limited
and Gazeley GLP Northampton s.à.r.l.

**Northampton Gateway PINS Reference Number
TR050006**

4 April 2019

- 1.1 Within this Deadline 9 submission, Rail Central responds to the material submitted at Deadline 8 by Northampton Gateway (NG) in response to Question 1 of the ExA's Request for Further Information dated 29 March 2019.
- 1.2 Rail Central has consistently identified and supported with evidence its concerns over the lack of consideration and clarity given to climate within the NG Environmental Impact Assessment (EIA) and Environmental Statement (ES).
- 1.3 The Appendix to this document summarises these concerns where they have been raised through Rail Central's previous submissions to the NG examination.
- 1.4 The key issues regarding climate are summarised in Rail Central's written representations submitted at Deadline 1 and still remain.
- 1.5 Rail Central does not intend to repeat valid comments made previously, but responds here to Document 8.25 [REP8-003]. References in the bulleted list below are in respect to this document only.
 - The Infrastructure Planning (EIA) Regulations 2017 are clear to define that 'climate' should be considered as greenhouse gas emissions and impacts relevant to climate adaptation, which is in accordance with National Guidance as explained in detail in previous Rail Central submissions.
 - Rail Central does not agree with paragraph 2.11. Rail Central agrees that different methodologies may be appropriate, however, the methodology for the assessment of climate within the NG ES is not clear, neither are the conclusions. The conclusions should be within the main volume of the ES and it should be clear how climate has been considered as part of the assessment of 'impact interactions'.
 - Rail Central does not agree with paragraphs 2.14 to 2.16. Rail Central understands that the Sustainability Statement supports the ES, but neither in this document, nor in the Climate Change Summary within the NG ES is a conclusion provided on whether there are likely significant effects – either from greenhouse gas emissions or impacts relevant to climate adaptation.
 - Regardless of paragraphs 2.17 to 2.20, these parts of the NG ES fail to conclude whether there are likely significant effects on climate.
- 1.6 Rail Central's review of NG Document 8.22 Climate Change Summary, submitted at Deadline 7 [REP7-012] therefore remains valid. Document 8.25 [REP8-003] provided by NG fails to provide satisfactory answers and evidence. The lack of consideration of climate is evidenced throughout the NG ES and further evidenced by the table of updated residual effects provided by NG in Appendix 2 of Document 8.2, submitted at Deadline 1 [REP1-020], where the only reference to climate is in relation to runoff rates.
- 1.7 Most importantly, there is no conclusion within the NG ES as to whether there are 'likely significant effects' to climate, which should be the purpose of an EIA and the ES which communicates the findings of the EIA process.

Appendix

Summary of Rail Central's submissions to the Northampton Gateway Examination on Climate Change

Deadline	Document	Page / Paragraph
Deadline 1	Written Representation [REP1-029], [REP1-030], [REP1-031]	Section 9 (p 21-26) Appendix 10 – Rail Central Climate Change chapter 21 including GHG Assessment – Appendix 21.1, Rail & Road Freight Emission Factors – Appendix 21.1 and Climate Change Risk Assessment - Appendix 21.3) Appendix 11
Deadline 1	Summary of Written Representation [REP1-032]	Section 8 (p 5)
Deadline 1	Response to ExA's Questions (ExQ1) [REP1-033]	Response to question 1.0.4
Deadline 1	Appendix to Response to ExA's Questions (ExQ1) [REP1-033]	Appendix 3 (Rail Central Planning Statement - particularly Section 20 Flood Risk, Hydrology and Water Quality and Section 23 Climate Change)
Deadline 2	Comments on Deadline 1 Responses [REP2-016]	Response to question 1.9.1 (part vi)
Deadline 3	Comments on Deadline 2 Responses [REP3-016]	Appendix 2 - Draft "broader" SOCG – section 3.1.26 and 3.2.1
Deadline 4	Written Summary of Oral Submissions made at ISH2, ISH3 and CAH [REP4-020]	(none on climate – though general criticisms on the adequacy of the applicant's ES made)
Deadline 5	Response to Updated Comparative Analysis of Northampton Gateway and Rail Central Appendix 2.4 to Environmental Statement [REP5-027]	Section 4 (para 4.4 p 12)
Deadline 5	Response to the Northampton Gateway Updated Cumulative Impact Assessment [REP5-026]	Para 19

Deadline 7	Review of Northampton Gateway Document 8.22: Climate Change Summary [REP7-012]	Entire document
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