Prepared on behalf of local communities by the 'Stop Roxhill Northampton Gateway' Action Group (SRNG)
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This is a response to the reply given by Roxhill to the question (below) put by the Examining Authority (Q2) following the Deadline 7 submission by SRNG

Q2.In its Deadline 7 response, Stop Roxhill Northampton Gateway suggests that, having regards to climate change, and whilst acknowledging the Applicant's 2019 Climate Change Summary (Doc 8.22 [REP6-015]), there is no additional content to provide insight or confidence of the total impact of the Proposed Development in lifecycle terms relating to carbon lifecycle calculations. Can the Applicant please comment?

In their reply Roxhill simply state that the Climate Change Summary, '*was a document which summarised and signposted'* and that *'the Regulations do not prescribe how effects on climate should be assessed'*. They say that the Applicant *'has carried out the assessment it feels is appropriate'*. They also say that *'there is no requirement to assess the carbon or greenhouse gas emissions over the 'life-cycle' of a project in the EIA Regulations nor is it required in the NPSNN'. They go on to say 'However, the reality is that, such emissions can only be truly measured at source as they occur. Furthermore, there is no single approved methodology for evaluating and assessing greenhouse gas emissions nor are there established criteria or any defined significance thresholds. The Applicant takes the view that such an academic exercise (as that carried out by Rail Central) has little value given the inherent uncertainties and the extensive assumptions upon which such an exercise is based'.*

Given this unsatisfactory response, SRNG continue to believe that there has been little attempt by Roxhill to calculate the likely carbon lifecycle issues of the development and that claimed benefits from modal shift in freight transport are purely notional. This seems to be at variance with the requirements of PINS Advice note 9 which states that "Using the Rochdale envelope and paragraph 104 of the judgement in that particular case: "the level of information required is: sufficient information to enable the main or the likely significant effects on the environment to be assessed and the mitigation measures to be described."

This concern over carbon lifecycle calculations is particularly relevant now that the Northampton Gateway proposal is now co-sponsored by SEGRO, one of the largest 'big box' warehouse developers in Europe. This confirms our view that the proposed development is less to do with strategic rail freight and more to do with building warehouses. It is widely acknowledged that large warehouses are problematical when dealing with issues of carbon lifecycles and draw your attention to a study conducted by City University of London. In its introduction, the study states:

"In recent years, there has been observed a continued growth of global carbon dioxide emissions, which are considered as a crucial factor for the greenhouse effect and associated with substantial environmental damages. Amongst others, logistic activities in global supply chains have become a major cause of industrial emissions and the progressing environmental pollution. Although a significant amount of logistic-related carbon dioxide emissions is caused by storage and material handling processes in warehouses, prior research mostly focused on the transport elements. The environmental impact of warehousing has received only little attention by research so far. Operating large and highly technological warehouses, however, causes a significant amount of energy consumption due to lighting, heating, cooling and air condition as well as fixed and mobile material handling equipment which induces considerable carbon dioxide emissions."

http://openaccess.city.ac.uk/17118/1/Environmental%20impact%20of%20warehousing%20A%20scenario%20analysis%20for%20the%20United%20States.pdf

Rod Sellers on behalf of Stop Roxhill Northampton Gateway