

Final Submission by Derby Climate Coalition

Our objections fall into 5 categories: -

1. The Lack of proper analysis
2. The scheme objectives can be and should be met by other means
3. The Climate Crisis
4. The Ecological Crisis
5. Covid-19

1. The Lack of proper analysis

- The A38 scheme was chosen from a list of proposed road schemes on the basis of biased cost benefit metrics that are unsuitable for times of climate emergency – **perverse metrics that give much more emphasis to miniscule reductions in journey times than to the costs of increased emissions** – at a time of climate crisis, this is not acceptable. (we should consider here that CO₂ emissions remain in the atmosphere for thousands of years – so how do you quantify the costs of increased emissions to countless generations?)^{1 2 3 4 5 6}

¹ For example, less traffic and lower fuel consumption are treated as ‘costs’ in WebTAG rather than ‘benefits’ due to reduced tax receipts from fuel duty.

² Journey time savings are used as a proxy for all economic benefits, but other economic benefits are also added, leading to double counting. Buchan K. (2014) Only major reforms can restore confidence in appraisal. Letter from Keith Buchan, Director MTRU, to Local Transport Today, 643, March/April 2014.

³ David Metz, former chief scientist at the Department for Transport, has made many criticisms of the use of travel time savings in scheme appraisal: Metz D. (2008) The Myth of Travel Time Saving Transport Reviews 28, 3, pp.321-336; Metz D. (2014) Travel demand: the basics. Local Transport Today, 643, March/April 2014; Metz D. (2015) Economics of road investment – a critique, article on Peak Car website, 22 May 2015, accessed 21.02.19. Professor John Whitelegg has also argued that travel time savings should not feature in scheme appraisal: Whitelegg, J. (2012) How much transport can landscape tolerate: new ways of thinking about traffic, landscape and nature? in Koerner, S. et al. (eds) Landschaft und Verkehr, University of Kassel, Germany, ISBN 978-3-86219-358-5, pp 93-114. The principal criticism is that in practice, no time is actually saved (except in the very short term). Instead, new transport infrastructure opens up land for development of housing, shopping centres or business parks, and people have to travel further to reach jobs, shops etc.

⁴ In the case of a new high-speed road, the predicted time saved per driver is assigned a generous monetary value which is then multiplied by the millions of drivers forecast to use the road over its lifetime of say, 60 years. For example, in WebTAG the perceived value of the Working (Employers' Business) Time of a car driver is £14.86/hour in 2018 (at 2010 prices), which increases to £41.52/hour for 2070.

⁵ The practice of discounting, which places greater weight on costs and benefits in the short term, is supposed to reflect the fact that people, and society as a whole, prefer to receive goods and services now rather than later. However, this means environmental problems such as climate change, which incur large costs in the longer term, count for little. For example, a £1 billion environmental cost in 50 years' time is discounted to a net present value of £147 million. Hickman R. (2015) The problematic application of CBA in transport appraisal. Presentation, Sintropher final workshop, Brussels, 2015.

⁶ The costs and benefits occurring in the first 30 years of a programme, project or policy are generally discounted at an annual rate of 3.5%, declining thereafter. A high discount rate suggests those alive today are worth more than future generations, which some argue is unethical. This is why the Stern Review on the economics of climate change published in 2006 adopted a lower rate of 1.4%. Carbon Brief (2017) Q&A: The Social Cost of Carbon. 14 February 2017.

- No hard evidence has been forthcoming to show there has been any Option Generation Analysis by Highways England or the Department for Transport – something that ‘The Green Book’ / DfT’s Transport Analysis Guidance says should be done: -
 - 2.8.2 It is important that as wide a range of options as possible should be considered, including all modes, infrastructure, regulation, pricing and other ways of influencing behaviour. Options should include measures that reduce or influence the need to travel, as well as those that involve capital spend. Revenue options are likely to be of particular relevance in bringing about behavioural change and meeting the Government’s climate change goal.
 - • 2.8.3 Studies should not start from an assertion about a preferred modal solution, or indeed that infrastructure provision is the only answer.
 - • 2.8.5 Where highway solutions are being considered, options should include a consideration of different link/junction standards and other alternatives to address the problems in the area, such as public transport provision, demand management policies, traffic management measures and strategies.

This type of analysis is even more essential in the light of the Covid crisis and the worsening climate crisis.

2. The scheme objectives can be and should be met by other means

The objectives of this scheme are claimed to be as follows: -

- Promote economic growth - There is a lack of robust empirical evidence on the economic benefits of road schemes ⁷ ⁸ and we should also be very careful what we wish for – continual economic growth is what is fuelling the climate and ecological crisis.
- Reduce delays
- Increase reliability of journeys
- Increase road safety
- Reducing traffic volumes on the local road network

The last 4 bullet points all relate to the number of cars on the road and Highways England and the local authorities seem unable to grasp the concept that congestion on roads can be solved by methods other than huge infrastructure schemes.

⁷ Highways England (2016) Post Opening Project Evaluation (POPE) of Major Schemes Main Report: meta-analysis 2015 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/497241/POPE_Meta_2015_Final_210116_-_FINAL.pdf

⁸ Sloman L, Hopkinson L and Taylor I (2016) The Impact of Road Projects in England. Report for CPRE.

<https://www.cpre.org.uk/wp-content/uploads/2019/11/TfQLZZTheZImpactZofZRoadZProjectsZinZEnglandZ2017.pdf>

In contrast to that, if we are to solve the Climate and Ecological crisis, we need to be thinking in new and more radical ways. We need to create a world where people don't have to use their cars to get to work. We need to be doing everything we can to not only change to EVs but also to reduce the number of cars on the roads.^{9 10} There are welcome signs that this message is getting through – Grant Shapps himself said on 9th March, ““We know cars will continue to remain vital for many, but as we look to the future, we must build a better country with greener travel habits, cleaner air and healthier communities.” We won't do this by building bigger/faster roads. Only last week, the independent Committee on Climate Change recommended in their Report on Progress ¹¹, that the government should be “prioritising resilient broadband investments over the road network” (to encourage home-working). A new think tank, Green Alliance have also come out against road building in a report this week.¹²

The greener, cleaner future requires investment in integrated public transport systems and housing developments that are centred around active travel, NOT BIGGER ROADS!

3. The Climate Crisis

- This scheme will increase emissions by around 160,000tonnes, which is equivalent to 6% of Derby's total transport carbon budget to 2100. This is significant!
- When scaled up, we calculate that that the RIS2 programme will increase UK emissions by around 17Mtonnes which will almost double the policy gap of 19Mtonnes already identified by the CCC in UK transport.
- The 4th Carbon Budget (which is expected to be tightened) requires all sectors to reach a 50% reduction over 1990 levels in the years 2023-2027 – this scheme as part of RIS2 will make that impossible.
- Contrary to legal requirements, and contrary to HE's claims, there has been no Strategic Environmental Assessment of the RIS2 programme and therefore no cumulative impact assessment of the RIS2 schemes. The Paris agreement has therefore not been taken into account.

⁹ Aligning UK car emissions with Paris (1.5-2°C) provisional carbon budget analysis - Prof. Kevin Anderson, Tyndall Centre for Climate Change Research. Presentation at the lowCVP Conference. July 2019.

<https://www.lowcvp.org.uk/events/conference.htm>

¹⁰ Hopkinson L. and Sloman L. (2019) More than electric cars. Why we need to reduce traffic to reach carbon targets. Briefing for Friends of the Earth. February 2019.

<https://www.transportforqualityoflife.com/u/files/1%20More%20than%20electric%20cars%20briefing.pdf>

¹¹See pages 145, 152 and 179 of <https://www.theccc.org.uk/wp-content/uploads/2020/06/Reducing-UK-emissions-Progress-Report-to-Parliament-Committee-on-Cli..-002-1.pdf>

¹² https://www.bbc.co.uk/news/business-53214997?intlink_from_url=https://www.bbc.co.uk/news/topics/c4y3wxdx24nt/our-planet-matters&link_location=live-reporting-story

4. The Ecological Crisis

- HE's own report says, "The construction phase would be the most disruptive period for ecology and nature conservation. Vegetation clearance would remove habitats in the short term before the maturation of new landscape planting, and the exclusion of protected species from the construction works areas would be required. This would cause significant disruption to local habitats and local animal populations in the short term."
- The A38 Roundabout LWS (Local Wildlife Site) would be permanently lost, resulting in a significant adverse effect.
- Over 100 mature trees would be lost in the Markeaton area alone, including an ancient oak – T358. Ancient oaks provide habitat for 2300 species, of which 320 are found *only* on oak. This is irreplaceable.
- Local populations of otter, white clawed Crayfish and bats are likely to be disturbed.
- Derbyshire Wildlife Trust have concerns over the outdated Biodiversity Metrics used for the scheme and the inadequate Habitat surveys.

We are in the 6th mass extinction event – the UK doesn't have much natural habitat left – this is our Amazon – we shouldn't be destroying it!

5. Covid-19

- Derby was identified in 2015 as one of five local authority areas with problem levels of nitrogen dioxide (NO₂) and told to take action to resolve the situation in the shortest possible time.¹³
- Derby City Council have stated that air pollution in Derby will increase for the 4 years of construction if this scheme goes ahead.¹⁴
- The All-Party Parliamentary Group on Air Pollution has released a strategy document regarding air pollution in the UK. In it they say, "air pollution must be kept at low levels to help avoid a second peak of coronavirus infections."¹⁵
- There is growing evidence from around the world linking exposure to dirty air and increased infections and deaths from Covid-19.¹⁶

The health of the people of Derby should not be put at risk by going ahead with this scheme at this time.

¹³ <https://www.derbyconnected.com/airquality/>

¹⁴

https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/environmentalprotection/ED11928_Derby%202019%20AQAP_Draft_Issue%208%20Final.pdf

¹⁵ <https://appgaq.files.wordpress.com/2020/05/clean-air-exit-strategy.pdf>

¹⁶ <https://www.theguardian.com/world/2020/may/04/is-air-pollution-making-the-coronavirus-pandemic-even-more-deadly>

Our plea – this scheme, along with the rest of the RIS2 programme, is the last thing we need in this time of multiple crises.

We need policies and investments to be focussed on projects that protect our natural world and help us mitigate the climate crisis.

This scheme does the opposite – we ask that it is scrapped immediately.

I would like to thank the Planning Inspectorate for their consideration and professional handling of this enquiry.

Alyson Lee

On behalf of Derby Climate Coalition