

Request for Responses – Section 8

8.2 Derby Climate Coalition - Are the claimed economic benefits of the scheme are sufficiently supported by evidence from comparable road improvement schemes, having regard to the concerns expressed [REP6-030] and the documents appended to it?

There is a lack of robust empirical evidence on the economic benefits of road schemes

Highways England's own meta-analysis of major road projects¹ could only find "anecdotal evidence" that these had provided local and regional economic benefits through congestion reduction and improved journey times. Contrary to their claim that 21 of the road schemes included in the meta-analysis which had a specific objective relating to 'stimulating the economy' had achieved their objective, this has been questioned by an independent review for CPRE which found little or weak empirical evidence for economic benefits.² This review found that out of 25 road schemes that had an objective relating to stimulus of the local or regional economy:

- Eight had no evidence presented to enable a judgement to be made about the economic impact of the scheme.
- Three schemes had weak negative evidence (i.e. suggesting that the scheme had actually resulted in a disbenefit to the local economy).
- Three schemes relied on weak indirect evidence of a decrease in journey times to argue that an economic benefit could be inferred.
- Six schemes had weak evidence that the scheme might have benefitted the local economy, typically anecdotal.

Five had moderate evidence of a relationship between economic development and the scheme. However, even this was questionable, and in some cases was as likely to suck money out of the local area as to bring it in.

The CPRE study concluded that "*The evidence is considerably weaker than it is made to appear, and the most plausible meta-level conclusion would be that the economic impacts of road building are uncertain, and may be either positive or negative. That is, from the empirical evidence gathered by the POPE process over the last 15 years, it is far from proven that road schemes have an immediate impact in stimulating the local economy.*"

The CPRE study also looked at the academic literature for evidence. There is only one study that provides any evidence that road schemes have a positive effect on

¹ 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

² 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/TfQLZ-ZTheZImpactZofZRoadZProjectsZinZEnglandZ2017.pdf>

employment levels and even then the study noted that it was impossible to determine whether the jobs were truly 'additional', or whether they were simply a result of firm re-location.³ Other than this there is very little robust evidence on the economic impacts of road projects. The What Works Centre for Local Economic Growth reviewed around 2,300 evaluations of the local economic impact of transport projects from the UK and other OECD countries, and found only 17 robust studies of the effect of road schemes on the local economy.⁴ The main findings of the review were:

- Roads can positively impact local employment. But effects are not always positive and a majority of evaluations show no (or mixed) effects on employment.
- Road schemes may increase firm entry, although not necessarily the overall number of businesses (as new entrants may displace existing firms).

A blog by Dr Steve Melia of University of West England⁵, based on a longer article⁶, also challenges the prevailing view that roads creates economic growth citing a lack of evidence. He concludes:

“Transport will never be the main driver of economic growth; its role is facilitative. Instead of pursuing illusory economic benefits, policy-makers should ask: What sort of society do we want? What sort of economy should serve it? And then: What sort of transport system should serve both?”

The purported time savings of road schemes often do not materialise

Further, most of the purported 'benefits' of the A38 widening are based on the predicted time savings for drivers – which in turn is based on miniscule time savings for individual drivers multiplied by millions of drivers over decades. And yet, based on almost a hundred years of evidence that building roads creates more traffic⁷, such time savings are more than likely to disappear within a few years and the forecast benefits will not materialise. For example the SACTRA report on Trunk Roads and the Generation of Traffic⁸ suggested that the average road improvement would see an additional 10% of base traffic in the short term.

In conclusion, there is NOT sufficient evidence to support the claim that this road scheme will bring economic benefit.

³ Gibbons et al. (2012) New road infrastructure: the effects on firms SERC Discussion Paper 117. http://eprints.lse.ac.uk/58527/1/_lse.ac.uk_storage_LIBRARY_Secondary_libfile_shared_repository_Content_SERC%20discussion%20papers_2012_sercdp0117.pdf

⁴ What Works Centre for Local Economic Growth (2015) Evidence Review 7: Transport. <https://whatworksgrowth.org/policy-reviews/transport/>

⁵ <https://bettertransport.org.uk/blog/better-transport/does-road-building-boost-economy-claim-has-never-been-proven>

⁶ Melia, S. (2018) 'Does transport investment really boost economic growth?' World Transport Policy and Practice

⁷ <https://stopcityairportmasterplan.tumblr.com/post/19513243412/induced-traffic-again-and-again-and-again>

⁸ <https://bettertransport.org.uk/sites/default/files/trunk-roads-traffic-report.pdf>

Request for responses – Section 9

9.1 b) Please could DCiC, DCC and EBC comment on the cumulative impacts of the proposed development with other local emissions and in respect to relevant local policy and targets?

I would like to point out that both DCC and DCiC have Local Transport Plans that were published in 2011 covering the period up to March 2026.

DCiC declared a Climate Emergency in May 2019 but have not yet revised their Climate Change Strategy (produced in July 2015) or their Local Transport Plan to be in line with the government's 2050 target.

In their 2015 Climate strategy DCiC identified Smarter travel options as a major theme. One action was to Work in partnership to invest and implement sustainable transport infrastructure and initiatives across the city.

In our view more work needs to be done in this area. The intention is to decrease the number of vehicles using the A38. It has been said that 55% of the vehicle use on the related sections of A38 around Derby is for local traffic. If DCiC were successful in implementing their alternative policies the load on the A38 would be decreased, making the case for this scheme even weaker.

DCC, having failed to declare a Climate Emergency last May, have published a target to become carbon neutral by 2032. However, they have also failed to revise their Local Transport Plan published in 2011. So, both councils are working to outdated guidelines.

Erewash Borough Council does not have a policy on the Climate Emergency and doesn't appear to have a Transport Policy.

9.2 a) Does the Applicant's approach to carbon emissions adequately consider the Government's updated target for net zero carbon by 2050 (Climate Change Act 2008 (2050 Target Amendment) Order 2019)?

HE has stated in their response to ISH4 submissions: -

[‘The Green Book’ is guidance issued by HM Treasury on how to appraise policies, programmes and **projects** and manage public money. The Green Book sets out the parameters and methods to be used. The DfT's transport appraisal guidance (**TAG**) follows this HM Treasury guidance.]

In the TAG Section 4 Greenhouse Gases

4.1.2 says ‘In June 2011, the fourth Carbon Budget was announced, amounting to an **emissions cut of 50% on 1990** levels over the years 2023-2027. Further carbon budget periods may be announced in the future. **Each sector must play its part in taking action to achieve these budgets.**’

Furthermore, the governments commitment to reach net zero carbon emissions by 2050, made in June last year, should require the 4th Carbon Budget to be even more ambitious.

I can find no evidence that HE has considered how this scheme is going to help achieve a 50% cut on 1990 levels over the years 2023-2027 let alone a bigger cut to meet net zero by 2050. Their approach to carbon emissions is mainly to minimise emissions during construction, so **does not adequately consider the government's 2050 net zero target.**

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9.2 b) Please could DCiC, DCC and EBC comment on the carbon emissions from the proposed development with respect to relevant local carbon policy and targets?

DCiC declared a Climate Emergency in May 2019 but have yet to come up with an Action Plan to reduce their greenhouse gas emissions in line with the government's 2050 target. The emergency declaration prioritises the reduction of greenhouse gas emissions yet surprisingly, in relationship to the A38 scheme, we cannot see any reference by DCiC to the increase in emissions, both in construction and caused by vehicles.

Without a relevant and up-to-date policy, we are unsure whether DCiC can make an informed opinion on this question.

DCC, having failed to declare a Climate Emergency last May, have published a target to become carbon neutral by 2032. However, this target is only for the Council to reduce emissions from its own operations to net zero. Although DCC claim to be 'Using its influence and role as a community leader to work with partners, businesses and communities to tackle climate change through a common framework for action across the county', it seems to be failing to use its influence in the field of surface transport by supporting this road scheme.

Erewash Borough Council does not have a policy on the Climate Emergency and doesn't appear to have a Transport Policy.

9.4 c) Has enough consideration been given to the climate change with respect to the loss of mature trees and the planting of new trees?

Mature trees not only sequester a lot of carbon but are critical resources for biodiversity. The ecosystem that they support has taken decades to develop and cannot be replaced by planting young trees.

So, in response to this question I would like to you to consider the Submission on Biodiversity that I was prevented from giving at the ISH4 due to lack of time: -

Biodiversity

The emergency that we face as a race is not just about climate – it is a Climate and Ecological Emergency.

The UK is the most **nature depleted** country in the world – we have systematically eaten away at natural habitats

- We cover front gardens with hard-standing for cars
- We cut down trees because they make a mess
- Our industrial agriculture has produced a landscape that is predominantly made up of monocultures
- We ‘manage’ large areas of land to suit people’s fishing, hunting and shooting hobbies.
- Our gardens are dominated by manicured lawns – again an un-natural monoculture
- AND WE BUILD UNNECESSARY ROADS AT THE EXPENSE OF NATURAL HABITATS

IPBES Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services

Says:-

- **The biosphere, upon which humanity as a whole depends, is being altered to an unparalleled degree across all spatial scales. Biodiversity – the diversity within species, between species and of ecosystems – is declining faster than at any time in human history.**
- **More than 75 % of global food crop types, including fruits and vegetables and some of the most important cash crops, such as coffee, cocoa and almonds, rely on animal pollination.**
- **Marine and terrestrial ecosystems are the sole sinks for anthropogenic carbon emissions, with a gross sequestration of 5.6 gigatons of carbon per year.**
- **Nature across most of the globe has now been significantly altered by multiple human drivers, with the great majority of indicators of ecosystems and biodiversity showing a rapid decline.**
- **Human actions threaten more species with global extinction now than ever before.**
- **The rate of global change in nature during the past 50 years is unprecedented in human history. The direct drivers of change in nature with the largest global impact have been (starting with those with most impact): changes in land and sea use**
- **Economic incentives have generally favoured expanding economic activity, and often environmental harm, over conservation or restoration.**

The species that are particularly studied (Great crested newts, White-clawed Crayfish, Bats etc.) because they are known to be particularly at risk should not blind us to the overall destruction of natural habitats – for example a veteran oak provides a habitat for 2300 species, of which 320 are found *only* on oak.

We have particular concerns about this scheme on the following ecological grounds:-

- **Otters – experts at Sheffield University are concerned over the effect of the scheme on the local otter population which is known to be expanding in this area** [REDACTED] [REDACTED]
The otter surveys carried out are rather out-of-date and it is known that 'Otters can travel over large areas. Some are known to use 20 kilometres or more of river habitat.'
- **Great crested newts are known to be found in an area just outside the 500m buffer zone – an area that was thought important enough to warrant a special survey**
- **There are 2 established colonies of bats that are going to have their chosen home knocked down and replaced with bats boxes**
- **Derbyshire Wildlife Trust have concerns over the outdated Biodiversity Metrics used for the scheme and the inadequate Habitat surveys – meaning that HE are guessing at the mitigation required to leave the project with a biodiversity net gain.**
- **Last time Little Eaton Roundabout was modified there were significant delays due to the presence of White clawed Crayfish**
- **The Woodland Trust are concerned about the felling of a veteran oak – T358 and point out that the National Planning Policy Framework states: “*development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons*”.**
- **Friends of the Earth are concerned on many grounds including climate, biodiversity, Open Space, Flooding and Human Rights.**

Of course, the climate emergency goes hand-in-hand with the ecological emergency – they are intertwined. So, I would like to add the ecological harms of this scheme to the climate harms to add weight to our argument that this scheme SHOULD NOT GO AHEAD in this Climate and Ecological Emergency.

However, if the scheme does go ahead, we would insist on adequate, up-to-date surveys and the use of up-to-date Biodiversity Metrics to ensure an adequate level of Biodiversity mitigation instead of just guesswork.

Thank you.