

Comments from Derby Climate Coalition on HE's response to our ISH4 Submission

In response to our submission regarding the complete lack of Option Generation in the Transport Appraisal for the scheme, HE have stated that **The Scheme was originally defined by the road-based studies of 2002**. A number of alternative options were investigated up to Preferred Route Announcement in January 2018. I can find no evidence to suggest that any of these alternatives are anything other than different route options.

But Dft's Transport Appraisal Guidance (TAG May 2018) states that the three stages in the Transport Appraisal Process are as follows:

- **Stage 1** – Option Development. This involves identifying the need for intervention and developing options to address a clear set of locally developed objectives which express desired outcomes. These are then sifted for the better performing options to be taken on to further detailed appraisal in Stage 2. See Section 2.
- **Stage 2** – Further Appraisal of a small number of better performing options in order to obtain sufficient information to enable decision-makers to make a rational and auditable decision about whether or not to proceed with intervention. The focus of analysis is on estimating the likely performance and impact of intervention(s) in sufficient detail. See Section 3.
- **Stage 3** – Implementation, Monitoring and Evaluation. See Section 4. 1

HE have made overriding assumptions at all stages that the only solution to the perceived problems are to provide major road modifications. They have totally refrained from any consideration of options other than road-based ones.

This is a blatant disregard of the Transport Appraisal Process and completely ignores the first of the three stages – Option Development.

The need for this option development process to be reviewed properly was made even more necessary when the Climate Change Act came into force in 2008 and when the Paris Agreement was made in 2015. The TAG (May 2018) even states: -

- 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 is shown in TAG UNIT A3 - Environmental Impact Appraisal which states: -

- 4.1.2 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.

This scheme would be under construction during this 2023 – 2027 period and so must be shown to contribute to the 50% emissions reductions required in the 4th Carbon Budget.

We are in a Climate Emergency requiring drastic reductions in carbon emissions – the target set last June of net zero carbon emissions by 2050 will require the 4th Carbon Budget reductions to be even higher. This is going to require not only a very quick conversion to EVs but also a reduction at least 20% in the number of cars on the road.

In these circumstances a major road scheme such as this, with its associated increase in traffic volumes and carbon emissions, cannot be permitted to go ahead. It is essential that an Options Development Process is undergone to find more suitable solutions in a time of Climate and Ecological Emergency.

In a crisis the first thing you do is stop making things worse! This scheme will only make climate change worse!

The Planning Inspectorate surely has a responsibility to challenge the validity of this scheme in terms of national policy on climate change as well as the NPSNN.