A57 Link Roads – Written Submission by South Yorkshire Climate Alliance 13/1/22

Summary

The link roads scheme would increase greenhouse emissions to the extent that legally binding carbon binding carbon budgets would be jeopardised. The climate ambitions of both Local Authority areas in which the scheme is situated would be extremely difficult to meet.

The NPPF calls for developments to contribute to radical reductions in greenhouse gas emissions. We believe that consideration should be given great weight. This is especially the case in view of Government planning and general climate policy being flawed so as to jeopardise its own climate commitments. Our submission describes evidence from TfN and climate scientists from the Tyndall Centre of Climate Science to support this view.

We make a brief quantitative analysis to demonstrate that the link roads would create an excessive proportion of a total notional transport carbon budget for Tameside.

We believe that planning consent should be refused.

Introduction to South Yorkshire Climate Alliance

SCA is an alliance of South Yorkshire based organisations and individuals who are pressing for fair and effective action to tackle climate change [see About – South Yorkshire Climate Alliance].(Please note that since we made our outline submission, we have changed our name from Sheffield Climate Alliance.)

How planning policy assesses transport projects against climate objectives

Probably the most fundamental statement that new developments should support Government climate policy is expressed in para 152 of the National Planning Policy Framework[i]. (Note we are referring to the 2021 edition of the NPPF - para numbers differ in earlier editions).This states (with italics added by us):-

"152. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute *to radical reductions in greenhouse gas emissions*, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

Whilst this is not made explicit, it seems reasonable to assume that the "radical reductions" in emissions must contribute adequately to an overall strategy to meet the legally binding targets of the Climate Change Act.

National Highways (NH) - then called Highways England - described how national planning policy assesses whether emissions from a road scheme can be justified, in Clause 14.3.11 of the Preliminary Environmental Information Report for this scheme. It stated:-

" There is no accepted technical or policy guidance on how to determine the significance of a project's effects on climate. However, the National Networks National Policy Statement (NN NPS)

acknowledges that the emissions from the construction and operation of a road scheme are likely to be negligible compared to total UK emissions, and are unlikely to materially impact the UK Government's ability to meet its carbon reduction targets: 'it is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets'. "

This suggests no project should be rejected unless it "single handedly "jeopardises any entire national carbon budgets. If that is the case, this approach is entirely reliant on there being an overarching transport decarbonising strategy that ensures that the number and scale of schemes entering the planning system cannot collectively jeopardise carbon budgets. In the next section we show that there is no such overarching strategy. Therefore, in order to comply with para 152 of the NPPF, it is necessary to examine whether each scheme could lead to emissions targets being exceeded, taking into account it would be just one of numerous schemes going through the same planning system.

Government climate policy relating to transport

The Department for Transport published its Transport Decarbonisation Plan in July 2021.[ii] This includes a graph of past and projected emissions up to 2050 (Fig 2 on page 45). The green shaded area represents the uncertainty range of emissions based on policies included in the plan. By 2050, the bottom of the range reaches zero. The footnote to the table includes the sentence "*Where feasible, uncertainty in projections reflects uncertainty on policy design, GDP, fuel prices, trip rates, and historic volatility in emissions*." The preceding text (page44) states "*In our decarbonising transport projections, lower bound emissions for land transport reach zero by 2050. This could be driven by a natural decline in petrol and diesel vehicle use as those markets, and associated infrastructure provision, decline over time. However, reaching the point of actual zero emissions may require additional measures beyond those identified here to support the final transition to fully zero emission surface transport."*

The existence of this graph is an advance on the draft plan which described a number of upcoming policies but gave little indication the emissions reductions they were projected to achieve. It appears to start addressing concerns raised by a number of interested parties and best expressed by TfN in comments in response to a consultation on that draft plan. This includes the comments, (the second and fourth of which we shall return to in the next section)[iii] :-

"*Our key messages to government within our response include: -*

The need for a quantified national pathway to net zero for transport by 2050, and a clear functional policy framework…

- The need for a clear decision on road user charging for all roads…

-That government must utilise the evidence base being prepared by TfN and other STBs…

Additional themes in our response include: - The need for clarity over government's approach to demand management and its role in accelerating modal shift."

Figure 2 of the final plan therefore provides a quantified but vague uncertainty range. It has not made public the detailed quantitative analysis to support it. The DfT have also acknowledged, as quoted above, that additional measures may be required "*to support the final transition to fully zero emission surface transport."* Yet it is not just the circumstances around the final transition 2050 that is unclear, it is how sufficiently rapid emission cuts, starting now, are to be achieved.(It is also worth noting from figure 2 that domestic transport emissions have barely reduced in 25 years, which gives an indication the success of policy interventions so far.)

Unfortunately, therefore, the DfT's own policy does not sufficiently support the NPPF's call for a "radical reductions in greenhouse gas emissions". This makes decision making on planning applications very difficult but in view of the UK's legally binding nature of the Climate Change Act, means it is especially important for this principle to be afforded great weight in the process.

Transport for the North Transport Decarbonisation Strategy

Transport for the North is statutory Sub-National Transport body so its Transport Decarbonisation Strategy of December 2021[iv] should be given serious consideration.

The Strategy aims for a near zero date in 2045, five years earlier than the Government's 2050 net zero target date. (Note "*near* zero" and "*net* zero" are different concepts but can be taken as similar in relation to the transport sector, in which no negative emissions technologies are involved).The selection of 2045 takes in to account that "*A number of our partners have set ambitious, economywide decarbonisation targets with net-zero dates pre2040 for their authority areas.* " and the reasoning is stated on page 11:-

"*In preparing a Decarbonisation Trajectory,TfN seeks to achieve a compromise by moving faster than current national policy and the Climate Change Committee's (CCC) advised trajectory, while being mindful of the varying levels of progress that our partners have made in terms of their own climate change responses. In this way, TfN's Decarbonisation Trajectory considers the ambitions of the whole region, but does not override or specify local place-based targets."*

Note that both the Local Authority areas in which the scheme would be situated are examples which have set pre 2040 net-zero dates –see next section. Further, TfN's pathway to near zero as represented in Figure 3, is roughly linear similar to that which will be followed at a national level if the five-yearly carbon budgets are to be complied with. In contrast, a fixed annual *percentage* reduction, as committed to by Tameside MBC and most of the other LAs referred to, would ensure that the most substantial emissions cuts are made at an early stage. This approach would imply lower cumulative emissions-which is what counts in determining how much temperature rise is caused- than a linear reduction. We therefore believe the term "average" as in the title to Figure 3 - "*TfN's Decarbonisation Trajectory reflects an average across local authorities that can decarbonise slightly slower or slightly faster"* - is slightly inaccurate.

Unlike the DfT, TfN sets out a quantified decarbonisation trajectory. It has then carried out detailed modelling to demonstrate how various plausible transport futures would compare to the trajectory.

Unfortunately, all four of TfN's "Future Travel Scenarios" fail to meet the decarbonisation trajectory it sets out, as illustrated on page 44. This is despite the supporting analysis making reasonable assumptions about the potential for all the various technological solutions being developed.

Discussion of how the "emissions gap" could be closed then follows, on pages 46-7 and then in the following "Policy Analysis" chapter. Demand management measures, including road user charging feature strongly. For example, a need to reduce projected car miles travelled of 3-14% below the growth modelled in the scenarios is identified (pages 48-9).

TfN has committed to assessing its entire Investment Programme against its emissions trajectory and "adjust it" if necessary (page 112, point SD6). The target date for this is "Pre-2025". In view of the scale of new road-building being a major influence on emissions and the fact that TfN's scenarios do not meet its own target emissions trajectory, we believe that this work should be completed before any new major road schemes should be permitted.

Local Authority Climate Targets

We believe that the climate ambitions of both Local Authorities in which the scheme would be situated should be considered, especially Tameside's as it would include most of the area of the scheme and has set science based targets.

Tameside Metropolitan Council declared a Climate Emergency in February 2020 and committed to align with Greater Manchester ambitions to become net zero by 2038. The 2038 target and an accompanying carbon budget are based on a dedicated report by the Tyndall Centre for Climate Change Research.[v] This included a robust methodology also used by many other Local Authorities – the "SCATTER tool" [vi]- which suggests that the Government's carbon budgets are overly generous to the UK. Note the online versions of these reports are regularly updated to reflect the current emissions reductions advice. Thus as of January 2022, the report recommends an all time carbon budget of 5.4 MtCO2e for Tameside (from 2020), before near zero emissions are reached in 2042.)

High Peak Council declared a Climate Emergency in October 2019 and pledged to work towards carbon neutrality by 2030.

Emissions associated with the link roads scheme- comparison with local targets

We consider it essential to compare these to the most appropriate notional transport carbon budget for the area. We have chosen Tameside's as a comparator as it covers most of the area of the scheme and is firmly evidence based. (In practice, emissions will be shared between Tameside and High Peak).

Emissions attributable to the scheme are described in Section 14.9 of National Highways' (NH) Environmental Statement[vii] . Para 14.9.8 states total scheme emissions in each of the fourth, fifth and sixth UK Carbon Budget periods. We compare these to a notional transport share of Tameside's carbon budget.

Table 1 breaks down this budget into the five yearly periods corresponding to UK carbon budgets. The current proportion of UK emissions due to surface transport is 22%[viii] so we have taken 22% of these figures as a notional transport budget for Tameside.

Results of this comparison are :-

	Scheme Total Emissions (MtCO2e)	Tameside Notional Transport Carbon Budget (22%)	Scheme's % of total
Fourth CB Period (2023-27)	55256	396 000	14%
Fifth CB Period (2028-32)	29235	198 000	15%
Sixth CB Period (2033-37)	31850	88 000	36%

Notes:

i) The construction emissions of 38 970 MtCO2e are accounted for entirely in the fourth carbon budget period and wholly within the transport sector. In reality, most of these emissions would be in other sectors.

ii) The figures are subject to a range of variables, including the proportion of total emissions taken up by UK transport. The proportion was significantly higher at 27% in 2017. This was the figure we used in our earlier outline submission and taken from NH's (then called Highways England) PEIR (para 14.4.1).

iii) The sharp drop in Tameside's carbon budget in the last period is due to it nearing its near zero carbon target date. (Tameside MBC has set a net zero target date of 2038, in line with Greater Manchester as a whole. The 2042 near zero target date recommended in the latest, updated, Tyndall Centre's report is due to amendments in that report since that target was announced).

We would contend that it is clearly disproportionate for a single relatively small scheme (constructing two links between other major roads) to account for between 14% and 36% of the total transport emissions target for the entire Local Authority area.

Emissions associated with the link roads scheme- comparison with national carbon targets

National Highways calculate that the scheme would entail emissions equal to 0.0028%, 0.0017% and 0.0033% of the fourth, fifth and sixth national carbon budgets respectively.

These percentages are obviously very small and again need to be considered in the light of the scheme only impacting a small locality relative to the UK as a whole. We do not offer a detailed comparison here but can give an indication as to their scale, within the context of the Tameside MBC area.

Some of The Tyndall Centre scientists involved in preparing the local carbon budgets have published a paper comparing their own analysis to that of national bodies (such as the CCC) which have set carbon budgets for developed "climate progressive" nations, such as ours[ix]. The scientists' conclusion is that the national ones are too generous by "at least a factor of two". This suggests that the link road scheme's proportion of a notional share of a local transport carbon budget based on the Government's legally binding budgets would be around half of those quoted in the table above. That is 7, 7.5 and 18% for the fourth, fifth and sixth carbon budget periods respectively. We would suggest this is still an unjustifiably disproportionate share.

In any comparison based on the Government's carbon budgets, including that used by NH, a recommendation by the CCC, made a part of its analysis for the setting of the Sixth Carbon Budget, should be taken into account. This is that emissions reductions need to outperform those set in the Fourth and Fifth Carbon Budgets, in order to stay on course to meet the Sixth.[x] To give an indication to the degree to which this should happen, the CCC now recommends emissions reductions of 68% from 1990 level should be achieved by 2030. This compares to the previous recommendation that the Fifth Carbon Budget, whose period includes 2030 as its middle year, should achieve reductions of 61%. This would lead to the percentage figures stated in the previous paragraph increasing around 11% to 8, 8.5 and 20%.

Conclusions

We believe that the scheme could not comply with the NPPF's requirement for developments to "contribute to radical reductions in greenhouse gas emissions ". In view of the fact that all planning decisions are based on essentially the same guidelines, giving it consent would demonstrate a serious risk to the government's legally binding carbon budgets. The scheme would make the meeting of the climate ambitions of the two Local Authorities in which it would be situated extremely difficult.

We believe it should be refused planning permission. Beyond that, the various authorities and actors involved need to consult with the public on very different and sustainable solutions to the current heavy traffic in the Mottram area. We suggest these will necessarily involve more emphasis on active travel, public transport, working from home and digital connectivity. They should collectively address air quality and congestion issues and preserving the quality off the Peak District National Park, in addition to climate.

Yours faithfully,

Chris Broome

On behalf of South Yorkshire Climate Alliance

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