



**Deadline 8 submission to the  
A12 Chelmsford to A120  
examination**

## Introduction

Transport Action Network (TAN) would like to submit into the examination relevant parts of the recently published Climate Change Committee's (CCC) *Progress in reducing emissions, 2023 Report to Parliament*, and their recommendations. We would like the CCC recommendations to be taken into consideration when the Examining Authority makes its recommendations to the Secretary of State for Transport.

## The CCC's 2023 progress report's recommendation on road-building

The CCC is an independent, statutory body established under the Climate Change Act 2008. Its role is to assess how the UK and devolved governments are meeting their legal obligations to reach net zero by 2050, whether they are on course to reach the 5-yearly carbon budgets to ensure a rapid reduction in carbon emissions, and the risks to delivery of plans to reach the carbon budgets.

The CCC's 2023 progress report included a recommendation that the Government should review its road-building proposals. Recommendation R2023-148 asked Government to:

*Conduct a systematic review of current and future road-building projects to assess their consistency with the Government's environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation.*

## The CCC's recommendations and the A12 Chelmsford to A120 scheme

TAN asks the Examining Authority to note that the CCC's recommendation includes "current" road-building projects, which includes the A12 Chelmsford to A120 scheme. It recommends that "decisions do not lock in unsustainable levels of traffic growth". We ask the Examining Authority to note that the proposed scheme would lock in unsustainable levels of traffic growth, and that the proposed scheme would go against this recommendation of the CCC.

The CCC also commented on the draft National Networks National Policy Statement (NNNPS) that "the draft statement needs to be clearer on the network's role in reducing

*traffic growth rather than simply meeting the demand projected in the Core NRTP scenario”.*

The proposed scheme would increase traffic growth, not reduce it. We ask that the Examining Authority notes that the proposed scheme would increase traffic growth, not reduce it, and this also goes against the recommendation of the CCC.

In the Climate chapter of the Environmental Statement (APP-082), the carbon from the extra traffic generated by the scheme is given as 1,535,559 tCO<sub>2</sub>e over the 60 year lifetime of the scheme (Table 15.22). That is over 1.5 million tonnes of additional carbon that would be emitted due to this scheme. This carbon would not be emitted if the scheme were not built.

The construction emissions, all within the fourth carbon budget, are 428,626 tCO<sub>2</sub>e (Table 15.21). These extra emissions would not be emitted if permission for the scheme was refused.

The Examining Authority has the opportunity to accept the recommendations of the CCC, recognise the scheme would increase traffic and carbon, and prevent 2 million tonnes of extra carbon by recommending refusal of the DCO.

## **Conclusion**

TAN asks that the Examining Authority has regard to the recommendations of the Climate Change Committee for a review of road schemes which increase traffic and carbon, and recommends refusal of the DCO.

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Rebecca Lush  
Roads and Climate Campaigner  
Transport Action Network

Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus and rail services, damaging road schemes and large unsustainable developments

254 Upper Shoreham Road, Shoreham-by-Sea, West Sussex, BN43 6BF

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