

Programme Officer - Jayne Hallam of Persona Associates

Dear Jayne

Herewith my response on behalf of myself and Stockport Friends of the Earth to the rebuttal by Stockport Council (LA) to my oral statement made to the A6 to Manchester Airport Relief Road Public Inquiry (Tuesday 30th September).

**My response to the rebuttal by the LA falls into 2 parts:**

- to question the validity and accuracy of the statement 'there is a **negligible change in overall carbon emissions** as a result of the scheme' ?
- and secondly and more importantly that standing still with respect to carbon emissions is not good enough with any scheme whose life cycle will span many decades. Significant reductions in emissions are essential. (i.e. **The clock is ticking. It is time to get serious about reducing our carbon emissions**).

**A6 to Manchester Airport Relief Road Public Inquiry (Compulsory Purchase & Side Road Orders / Public Inquiry)**

## **To question the validity and accuracy of the statement 'there is a negligible change in overall carbon emissions as a result of the scheme'?**

In 59/R04 The Local Authority (LA) rebuttal states 'business case identifies that the scheme will have a neutral impact on greenhouse gas emissions - there is a negligible change in overall carbon emissions as a result of the scheme'.

The LA Transport Business Cases appear to state that the LA has used the Department for Transport (DfT) 'Carbon tool for local authorities'.

Yet with reference to the DfT Basic LA Carbon Tool – User Guide Page 2 . . .

Carbon tool for local authorities - The Department's tool to assist local authorities' assessment of the potential effects of transport interventions on carbon emissions in their area.

What can the tool be used for?

Carbon and cost saving information for business cases - based on best estimates of take-up and effects of intervention

Initial exploration of policies to see which policies might be worth researching and pursuing further

Indicative exploration of sensitivity of carbon savings using a range of assumptions about take-up

**The Department does not attach any weight to the tool in terms of bidding for central funding, or forming part of appraisal guidance.**

**However this should not prevent authorities using the tool to inform their own decisions.** The tool has deliberately been designed to allow a high degree of flexibility for local inputs. Assumptions about local behaviour should be well evidenced and proportionate.

***Clearly, a more rigorous methodology or tool is required. If this has been used to calculate carbon emissions, please ask the LA to identify such evidence from their ocean of documentation, or produce evidenced use of a correct methodology and tool?***

Furthermore, in assessing carbon emissions, the User Guide states the following:

### 2.5 How to Reduce Emissions at the Local Level

Reducing carbon emissions from transport at the local level can generally be delivered by:

Technological change e.g. purchasing more fuel efficient vehicles

Assuming the cost of operating a particular vehicle remains the same, technological change is unlikely to impact significantly on road traffic speeds. This is because in the absence of any change in the relative cost of operating such a vehicle, the overall level of demand following this technological change will remain unchanged. This means carbon savings will be achieved solely through the change in technology and not through a change in traffic speeds.

However, if the cost of operating a particular vehicle falls following a technological change - perhaps because a vehicle becomes more fuel efficient - while all other costs remain the same, then this form of technological change will impact on traffic speeds. This is because the cost of operating that vehicle will effectively fall and will therefore increase the demand for travel by this particular mode. An increase in demand will increase overall congestion and traffic. This will mean the change in carbon emissions will not only be from the change in technology but also through the change traffic and change in average speeds.

Behavioural change e.g. switching to 'greener' forms of transport; If behavioural change leads to people switching to different modes of transport then there will be an impact on demand and traffic speeds.

For example, behavioural measures aimed at encouraging the use of more sustainable modes of transport will inevitably lead to lower levels of car traffic. Lower levels of car traffic will therefore also reduce overall congestion. Lower congestion will increase average speeds and will therefore enable existing traffic to travel at more fuel efficient speeds. This means carbon savings from behavioural change measures will come through the change in traffic and through the change in average speeds.

***If Behavioural change forms part of the assessment of carbon emissions resulting in lower levels of car traffic, it begs the question - why do we need to build such a big road in the first place?***

**Standing still with respect to carbon emissions is not good enough with any scheme whose life cycle will span many decades.**

**Significant reductions in emissions are essential. (i.e. The clock is ticking. It is time to get serious about reducing our carbon emissions).**

National Carbon Budgets and targets - Committee on Climate Change (CCC)

The Climate Change Act established a target for the UK to reduce its emissions by at least 80% from 1990 levels by 2050. This target represents an appropriate UK contribution to global emission reductions consistent with limiting global temperature rise to as little as possible above 2°C

To ensure that regular progress is made towards this long-term target, the Act also established a system of five-yearly carbon budgets, to serve as stepping stones on the way.

The first four carbon budgets, leading to 2027, have been set in law. The UK is currently in the second carbon budget period (2013-17). Meeting the fourth carbon budget (2023-27) will require that emissions be reduced by 50% on 1990 levels in 2025.

Budget	Carbon budget level	% reduction below base year
1st Carbon budget (2008-12)	3,018 MtCO <sub>2e</sub>	23%
2nd Carbon budget (2013-17)	2,782 MtCO <sub>2e</sub>	29%
3rd Carbon budget (2018-22)	2,544 MtCO <sub>2e</sub>	35% by 2020
4th Carbon budget (2023-27)	1,950 MtCO <sub>2e</sub>	50% by 2025

The Committee on Climate Change will publish its advice to government on the fifth carbon budget in December 2015, covering the period 2028-2032, as required under Section 4 of the Climate Change Act. The government will propose draft legislation for the fifth budget in 2016.

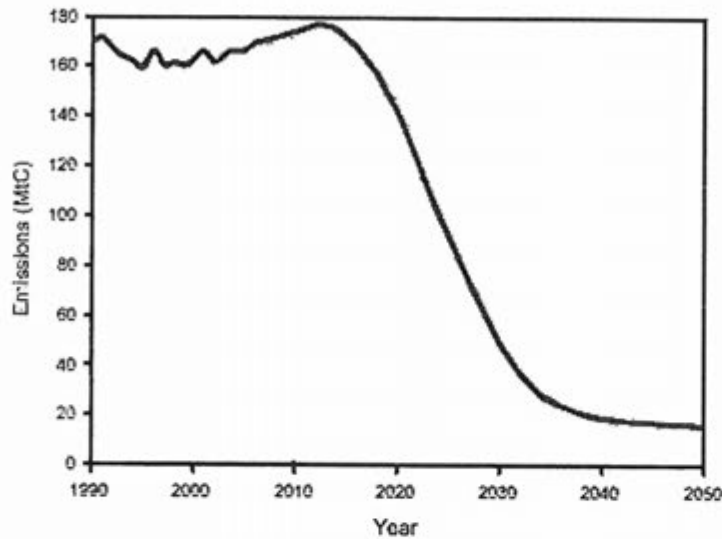
Local Carbon Budgets and targets - Greater Manchester Low Carbon Hub (GMLCH)

Stockport Council's chief executive and lead chief executive for the Greater Manchester Low Carbon Hub (GMLCH), Eamonn Boylan, told journalist Clare Wiley how the GMLCH is working towards a carbon reduction target of 48% in Greater Manchester by 2020. Also, Cllr Sue Derbyshire, leader of Stockport Council and new chair of GMLCH, gave an overview of the hub's goals - The work is exploring how much the Low Carbon Hub's work programme will contribute towards Greater Manchester's collective carbon reduction target of 48% by 2020.

***With unprecedented emissions reductions of 9%p.a. that will be required between 2014 and 2030 to achieve Government Targets on a 2°C global temperature rise above pre-industrial levels. Given that it is very much touch and go whether these emission reductions can be achieved at all, it is certainly unrealistic to allow the transport sector of the economy to lock in their current 'business as usual' high carbon transport emissions for decades and expect other sectors of our economy to make up for the shortfall in emission reductions.***

Unprecedented emissions reductions of 9%p.a. will be required between 2014 and 2030 to achieve Government Targets on a 2°C global temperature rise above pre-industrial levels.

This is a graph showing the forecast carbon emissions reduction required:



NB. the area under the curve denotes cumulative emissions (i.e. what really matters).

**The clock is ticking. It is time to get serious about reducing our carbon emissions.**

Please pass the above on to the Inspector and add the above to the Inquiry record.

yours sincerely

Chris Eldridge  
Coordinator  
Stockport Friends of the Earth