

BEXHILL TO HASTINGS LINK ROAD PUBLIC INQUIRY

Supplementary Proof of Evidence by

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**Evidence from core documents on need for
local authority schemes to reflect Government
policy on climate change**

on behalf of

The Hastings Alliance

1.1 This Supplementary Proof is a response to Mr Robertson's written statement submitted on 24th November, clarifying his view on the application of national targets to local schemes. This contains a single reference to support his position which is from paragraph 4.80 of the DfT low carbon transport strategy, core document CD 5/35.

1.2 This is contained in a sub-section which deals with reducing the need to travel through planning. The reference to PPS1 is in fact not at all in terms of how national targets do not apply to local schemes, but as an example of *"steps to ensure that the need to reduce carbon emissions is reflected in planning guidance."*

In this section the Government is clearly intending that climate change will be reflected in local schemes.

1.3 This is confirmed by the fact that it is immediately preceded, in CD 5/35, paragraph 4.79, by the statement,

"National planning policies already require local authorities to take account of the potential consequences for transport when making planning decisions."

It is a matter of urgency that the Secretary of State is informed that an ambiguous phrase in PPS1 is being used to undermine the clearly stated policy on climate change.

1.4 In fact, Chapter 4 is all about the need for all agencies, including local authorities, to pursue alternatives to the car. It begins with the statement, *"Technology measures are important in reducing transport emissions, but they are not enough on their own."* (Paragraph 4.1)

In the box following paragraph 4.5 it says,

"we must do more to realise the contribution that local authorities and regions can make to our carbon reduction goals".

This is very clear about how local authorities are expected to contribute to the national transport targets (i.e. the "carbon reduction goals").

1.5 The DfT extends the range of decisions further in paragraph 4.10, which says,

“Guidance and funding from the Department to the regions and local authorities is part of a wider picture of decision making that takes account of more than just transport objectives. We must ensure that these decisions lead to a greater contribution to carbon reduction whilst delivering on other local priorities.”

1.6 Following on from the introduction, Chapter 4 describes various initiatives which are being undertaken, both by mode and cross modal. They include examples of work with local authorities and businesses, some of which would reduce traffic.

1.7 This Chapter ends with a section entitled *“The need to travel”*. Mr Robertson’s quoted paragraph is in this section. It begins in paragraph 4.74, *“Beyond the measures set out above that seek to promote lower carbon transport choices, we should not lose sight of a more fundamental long-term solution – identifying ways of reducing the amount we need to travel.”*

1.8 This section goes on to look at two possible approaches. The first is new technology promoting home working or telepresence (a superior version of what used to be called teleconferencing). The second is spatial planning.

1.9 It is this clear that the document envisages a strong role for local authorities in implementing the transport targets through spatial planning as well as their transport decisions and their own transport activities.

1.10 Nor is Chapter 4 the only place in which CD 5/35 points to the importance of local authorities in achieving the targets. Chapter 7 is entitled *“How this strategy will work”* and includes a section entitled *“Regional and local partners”*. This section begins in para 7.10, *“Almost all journeys take place at least in part on infrastructure or services which are the responsibility of local authorities. They have the opportunity to affect emissions through the transport services they provide, the schemes and ways of travelling they promote, and the way they manage their transport networks.”*

1.11 Paragraph 7.13 goes on,

“We will work with other departments and our regional and local partners to ensure they can maximise their contribution to the climate change agenda across all of their operations and responsibilities. Local Transport Plans, Local Area Agreements and Integrated Regional Strategies provide the framework for taking this forward.”

1.12 As might be expected, the DECC Low Carbon Transition Plan, document, CD 5/33, is in tune with this, for example in the Summary for Chapter 2 *“Driving the transition”* page 36, it says,

“Every major decision now needs to take account of the impact on the carbon budget as well as the financial budget. The budget constrain twill be real: failure to reduce emissions through policies and measures could mean a need to buy credits from abroad.”

1.13 Our case is that the evidence before the inquiry shows clearly that the scheme as presented leads to a complete failure to achieve these transport targets over a wide area of East Sussex. This was not known at the strategic approval stage before the detailed modelling was undertaken and should now cause the scheme to be withdrawn.

1.14 If scheme promoters such as East Sussex are seeking to use a single phrase in PPS1 to try to avoid their responsibilities in relation to achieving transport’s carbon reduction targets clearly set out elsewhere, the Secretary of State needs to be informed as a matter of urgency. In our view it is tantamount to challenging Government policy.

1.15 The final test should be whether the East Sussex position is tenable in any real world sense. If every major local scheme is exempt from achieving the national carbon targets for transport, there is very little prospect of achieving those national targets.

1.16 We take the view that the Government is serious in its intention to minimise the impact of climate change in the UK and as part of its global responsibilities. This is now enshrined in legislation and from July this year has targets for each sector, including land based transport. Thus the Secretary of State should be advised not to proceed further with the scheme.