

Secretary of State for Transport  
Highways Agency  
Major Projects  
Broadway  
5 Broad Street  
Birmingham  
B15 1BL

22 November 2007

Dear Secretary of State for Transport

**Re: M25 widening, junctions 16-23 – Environmental Statement response**

We wish to comment on the impact of the scheme on carbon dioxide emissions, and the treatment of carbon dioxide in the Environmental Statement (ES). We object to the proposed scheme, and wish to see the government consider cheaper Active Traffic Management (ATM) with low speed limits to manage and reduce congestion, safety, and carbon emissions on the M25, rather than expensive widening.

**Inconsistency with government policy on transport and sustainable development**

This scheme would increase traffic and carbon emissions. Therefore it goes against government policies to reduce the need to travel, promote modal shift, and to reduce carbon emissions to tackle climate change. In particular it is completely counter to Planning Policy Guidance 13: Transport. The stated objectives of PPG13 are:

- 1. promote more sustainable transport choices for both people and for moving freight;*
- 2. promote accessibility to jobs, shopping, leisure facilities and services by public transport, walking and cycling, and*
- 3. reduce the need to travel, especially by car.*

It is also completely against Planning Policy Statement 1: Delivering Sustainable Development (PPS1). One of the objectives in the General Approach to Sustainable Development in PPS1 is:

*Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development.*

## **Environmental impacts outweigh perceived economic 'benefits'**

We believe the appraisal methodology to justify the perceived economic 'benefits' of the scheme is under doubt – especially with the NATA appraisal methodology currently being reviewed. One of the key areas under review is the way economic benefits are evaluated by measuring journey time savings, rather than journey time reliability.

We believe that the economic 'benefits' of this scheme are simply because of the exaggerated time savings, estimated over the 60 year appraisal period. We believe that the known significant environmental impacts, especially by increasing carbon dioxide emissions, massively outweigh these perceived economic 'benefits'.

## **Carbon dioxide impact of the scheme**

This section of the M25 widening, between junctions 16 and 23 is acknowledged to increase carbon dioxide (CO<sub>2</sub>) emissions *each year* by an extra 18,576 tonnes. The government is setting out, in its Climate Change Bill, a legally binding target of a 60 per cent *reduction* in carbon emissions by 2050, and has its own policy to *reduce* emissions by 20 per cent from 1990 levels by 2020.

These are ambitious targets, although scientists tell us that actually an 80-90 per cent *reduction* will be required by 2050, if we are to avoid reaching a catastrophic tipping point where human life becomes untenable. Whatever the target should actually be, it is clear that any *increase* in carbon emissions is taking us in completely the wrong direction for tackling climate.

The increase every year of 18,576 tonnes of extra CO<sub>2</sub> is not insignificant. The M25 already produces an enormous amount of CO<sub>2</sub> each year, and the government and Highways Agency should be doing all it can to *reduce* traffic growth on this crucial road, not increase it. The increase in CO<sub>2</sub> from the scheme is the equivalent of 152,262 people making return trips from London to Paris and back<sup>1</sup>.

Currently road transport is 25.7 per cent of all UK emissions, or 93.5 per cent of all domestic transport emissions. Road transport is therefore crucial in the challenge of tackling climate change. With each road scheme in the Highways Agency's Major Roads Programme all contributing additional CO<sub>2</sub> to the atmosphere, each individual scheme is very significant.

The Stern report on the economics of climate change said that the way to tackle transport emissions was through pricing carbon correctly, technology, but also crucially through *behavioural change*. The M25 widening will further entrench car dependent behaviour, and goes in the opposite direction we need to travel in to tackle climate change.

## **Quality of information relating to climate change in the Environmental Statement**

There is very little information in the ES relating to the carbon impact of the scheme. In a 526 page document, only half a page is devoted to the climate change impact. It is covered in paragraphs 10.6.4.31 – 35 only. Only paragraph 10.6.4.31 relates to the scheme. The other four paragraphs relate to a wider discussion on government policies on climate change.

The importance and urgency of climate change can not be over estimated. In the words of Prime Minister Gordon Brown on 19 November 2007, "overcoming it must be the great project of this generation".

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<sup>1</sup> Research by Paul Watkiss Associates and AEA Technology Environment for Eurostar has shown that each passenger on a return flight between London Heathrow and Paris Charles de Gaulle generates 122 kilograms of CO<sub>2</sub>, compared with just 11 kilograms for a traveller on a London-Paris return journey by train.  
[http://www.eurostar.com/UK/uk/leisure/about\\_eurostar/press\\_release/press\\_archive\\_2006/02\\_10\\_06\\_environment.jsp](http://www.eurostar.com/UK/uk/leisure/about_eurostar/press_release/press_archive_2006/02_10_06_environment.jsp)

The ES should have included information on the reasons WHY and HOW carbon emissions were increased by the scheme, rather than referring readers to the specialist software package, TUBA, which has calculated the 18,576 tonnes of extra CO<sub>2</sub> figure. It must be presumed that the scheme increases carbon emissions by increasing traffic growth and speed of travel. This should be clearly explained in the ES. How much extra traffic will be generated by the scheme? At what speeds will people be travelling? Is this sustainable?

Research on the impacts of road schemes post opening has shown that traffic on new roads is growing much faster than is forecast at the time of scheme justification (which is the stage this scheme is at now)<sup>2</sup> and is routinely under estimated. We believe that therefore the traffic growth predicted on this stretch of motorway could be larger than predicted.

Campaign for Better Transport disputes the projections for the transport measures included in the Climate Change Programme, in particular those for the Renewable Transport Fuels Obligation (RTFO). The projections of savings from the fuel duty escalator (1.9 MtC carbon) have already been made from 1994-99, as the FDE has been abandoned. Projections for the voluntary agreement package with car manufacturers are also vastly over estimated, as emissions from new cars have barely changed in the 10 years since the voluntary agreements were agreed.

Savings from the RTFO are widely accepted to be hugely over-estimated, especially as mounting evidence shows that biofuels would actually make climate change worse. Carbon is produced from the energy costs of harvesting, refining and transporting the fuel, also from cultivating previously uncultivated land.

A recent study by the Nobel laureate Paul Crutzen (*N<sub>2</sub>O release from agro-biofuel production negates global warming reduction by replacing fossil fuels*) shows that estimates of the 'benefits' of biofuels have ignored the contribution of nitrogen fertilisers. They generate a greenhouse gas - nitrous oxide - which is 296 times as powerful as CO<sub>2</sub>. These emissions alone ensure that ethanol from maize causes between 0.9 and 1.5 times as much warming as petrol, while rapeseed oil (the source of over 80% of the world's biodiesel) generates 1-1.7 times the impact of diesel<sup>3</sup>.

Despite (or perhaps because of) all the above transport measures in the Government's Climate Change Programme, road transport emissions continue to rise. The increase in road transport emissions is therefore due to traffic growing year after year, facilitated by expanding road capacity and road-dominated transport policies and spending.

Reducing traffic growth is therefore imperative in the battle to tackle rising road transport emissions. This will not happen by creating more capacity.

Yours sincerely



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<sup>2</sup> **Beyond Transport Infrastructure**, Lessons for the future from recent road projects – report by Dr Ian Taylor, Lilli Matson, John Elliott and Lyn Sloman for Countryside Agency and CPRE, July 2006. See: [http://www.countryside.gov.uk/LAR/Landscape/PP/planning/Recent\\_Transport\\_Research\\_C.asp](http://www.countryside.gov.uk/LAR/Landscape/PP/planning/Recent_Transport_Research_C.asp)

<sup>3</sup> PJ Crutzen, AR Mosier, KA Smith and W Winiwarter, 1 August 2007. N<sub>2</sub>O release from agro-biofuel production negates global warming reduction by replacing fossil fuels. Atmospheric Chemistry and Physics Discussions 7, pp11191–11205.  
<http://www.atmos-chem-phys-discuss.net/7/11191/2007/acpd-7-11191-2007.pdf>