

ISH 8 Submission – Net Zero by 2050

We are very concerned and shocked by some of the claims made by HE in their response to questions regarding Net Zero by 2050. (REP12-007 Part 3.3)

- HE say “**RIS 2 published in March 2020 supports Government’s plans for decarbonising road transport.**”

We would like an explanation from HE as to how they think a £27 billion road infrastructure programme, which is inherently going to hugely increase emissions not only in construction but also in operation, can possibly support the government’s plans for decarbonising road transport. This is simply illogical.

- HE then say “**The roads programme has been subject to impact assessments and complies with the Paris agreement obligations.**”

Contrary to legal requirements, and contrary to HE’s claims, there has been no Strategic Environmental Assessment of the RIS2 programme and therefore no cumulative impact assessment of the RIS2 schemes.

- HE then talks about the scheme being completed within the timescale of the 3rd and 4th carbon budgets as if this is some sort of justification.

Firstly the 3rd ,4th and 5th carbon budgets are not aligned with net zero and will be need to be tightened.

Secondly the Committee on Climate Change have advised that we are so far behind in our progress to meeting existing (pre-zero) Carbon budgets that we need to do much more to reduce emissions ASAP! Otherwise we won’t make the 5th budget! The Committee on Climate Change in 2018 has already identified a significant policy gap of 19 MtCO₂e between projected transport emissions (which already take account of the Road to Zero and the Clean Growth Strategy) and the fifth carbon budget in 2032. In the absence of official figures, we have done some rough calculations - If you assume there is a rough correlation between the emissions from a road scheme and the cost of that road scheme, the 160,000tonnes of CO₂ from the A38 scheme suggests emissions in the order of 17Mt CO₂ for the whole of the RIS2 road programme – this is, in effect, practically doubling the policy gap that the CCC have already highlighted. **That is extremely significant!**

Thirdly this fails to take account of the Paris Climate Agreement which sets temperature goals which requires the UK to reduce cumulative emissions over the next ten years (within the 3rd and 4th budgets), not just achieve a target reduction in 2050.

Note that the fifth carbon budget predates the net zero target and the Paris Climate Agreement. Therefore, both the RIS2 programme and the A38 Environmental Statement

have failed to take into account either the net zero target or the Paris Climate Agreement.

In *Friends of the Earth Ltd v Secretary of State for Transport* [2020] EWCA Civ 214, the Court of Appeal ruled that, in setting planning policy of national significance the impacts of the proposed development on the Paris Agreement were so obviously material that they had to be taken into account by the government. This ruling has obvious relevance to this inquiry, and therefore it is clear that the government should also take the Paris Agreement into account on all major infrastructure decisions. It has not done this in the case of RIS2 or the A38 and this is the reason for a 2nd legal challenge to the government which is now underway.

<https://transportactionnetwork.org.uk/2020/06/05/departments-addiction-to-road-building-challenged-in-historic-legal-case/>

- HE then say “By 2050 the majority of carbon emissions from the Scheme will be from road users. It is anticipated, however, that in line with Government policy these emissions will decrease significantly as the use of electric, hybrid and other low carbon vehicles increase and the national grid, supplying electricity to power these vehicles, decarbonises.”

But the penetration of electric cars over the next 10 years and the impact on carbon emissions will be minimal and this is the period that is most critical – I refer back to our previous submission about electric vehicles not being enough –government’s own analysis (Road Traffic Forecasts) shows that even under a high EV scenario road emissions will exceed existing (pre net zero) carbon budgets.

CCC have already pointed towards Schemes to support walking, cycling, public transport as a priority and have said that the longer term aim is a 98% reduction in transport emissions by 2050 – how can that be achieved with bigger roads?

- Then HE talk about the DfT report *Decarbonising Transport: Setting the Challenge* which is to be published in the autumn of this year.

Transport is the only sector where emissions have increased since 1990 levels. So as the transport sector, as a whole, is failing to meet pre-net zero carbon budgets and the existing policy gap will become even wider when those budgets are tightened in line with net zero (see CCC report below) we fully expect that report to backtrack somewhat on the DfT’s road building policies - Building new roads, like the A38 which will increase carbon, is the equivalent of throwing petrol on a burning house, while suggesting that we wait until the fire brigade arrives in a few months’ time.

The Sec of State has already said we need to use our cars less. What happens if the TDP (Transport Decarbonisation Plan) shows that no new roads can be built – this is a very good reason for delaying any decision on A38 until the TDP is published.

If we then look at part (c) of HE’s response, they say, “In line with the requirements of the NPS NN, the assessment of greenhouse gas (GHG) emissions presented in Chapter

14: Climate [APP-052] has considered the impact of GHG emissions from the Scheme against the legally binding UK carbon budgets and the UK carbon reduction target.” This is not true – the Environmental Statement for the A38 has assessed emissions against pre-net zero budgets and has not taken account of the Paris Agreement.

HE then go on to say, “There is no requirement to consider the Scheme against locally allocated carbon budgets. It is understood that the locally allocated carbon budgets are derived from the UK Carbon Budgets set through the Climate Change Act 2008 (amended 2019).”

As this suggests, The Environmental Statement does not take account of locally allocated carbon budgets which were not developed until summer 2019, after the publication of the Environmental Statement. Clearly local carbon budgets play an important part in meeting national targets, as the CCC’s 2012 publication ‘How local authorities can reduce emissions and manage climate risk’ makes clear - “There is a crucial role for local authorities in reducing emissions to meet national carbon budgets”

https://www.theccc.org.uk/wp-content/uploads/2012/05/LA-Report_final.pdf

The Tyndall carbon budgets which are being used by Derby City Council to develop its own climate strategy were commissioned by BEIS (Dept for Business, Energy and Industrial Strategy) and are clearly seen by government as an integral part of the national effort to meet climate targets. They are derived from the commitments enshrined in the Paris Agreement , informed by the latest science on climate change and defined in terms of science based carbon setting . They therefore should not be ignored by HE – if the country is going to meet its budgets it is very much relying on Local Authorities to meet their budgets. As stated in our first submission on this subject, our calculations show that the A38 scheme would use up 6% of Derby’s total transport emissions budget to 2100 – this is significant!

In summary

- **HE has not taken into account the Paris Agreement**
- **HE is ignoring Local carbon budgets which are critical if we are to meet the county’s carbon budgets**
- **In failing to consider cumulative emissions for RIS2 HE is ignoring an estimated 17Mtonnes of CO₂ which would almost double the significant policy gap of 19 MtCO₂e already identified by the CCC.**
- **HE is ignoring the Paris Climate Agreement temperature goals which requires the UK to reduce cumulative emissions over the next ten years (within the 3rd and 4th budgets), not just achieve a target reduction in 2050.**
- **HE is falsely relying on EVs as the sole solution to emissions on roads**
- **There is a legal challenge taking place over the RIS2 programme.**