

M25 junction 28 improvement scheme

TR010029

9.63 Carbon Budget Assessment

Rule 8(k)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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1. Introduction

1.1.1 This document sets out Highways England's response to the Examining Authority's request to submit the revised calculations regarding the Proposed Development's emissions contributions to both the third and fourth carbon budgets that was discussed at the Issue Specific Hearing (ISH) 1 on Agenda item 6.4 which the Examining Authority requested clarification in response to WQ1 GQ 1.13 (REP2-011). This document sets out the contribution to the emissions target set within the Government's third and fourth Carbon Budgets.

2. Carbon budget assessment

2.1.1 The carbon assessment carried out for the Scheme is presented in the Environmental Statement (ES) Chapter 14 Climate chapter (APP-036) is based on the Scheme traffic model data and the design and construction information.

2.1.2 As the construction of the Scheme is proposed to commence in spring 2022 and the opening year planned for autumn 2024, the Scheme will fall partially within the third carbon budget (2018-2022) and go into the fourth carbon budget period (2023-2027). Operation will fall within the fourth carbon budget period onwards. An assessment of the Scheme's contribution to the fourth carbon budget has now been undertaken.

2.1.3 The contribution of the Scheme to the fourth carbon budget is expected to be 0.001%. This is the contribution derived from both construction and operational emissions. Construction emissions have been assessed to contribute 24,636 tCO₂e during the fourth budget period, and operation to contribute 1,556 tCO₂e. The contribution of the Scheme to the fourth carbon budget is expected to be 0.001% which covers both construction and operational emissions. This re-assessment reduces the contribution of the Scheme to the third carbon budget to 0.0005%. This does not alter the conclusion of the ES Climate assessment, which is that the Scheme will not materially impact the UK's ability to meet its carbon budgets, and will therefore not generate a significant effect on climate (see paragraph 14.1.14.1 in APP-036). This conclusion is based on the policy stance set out in the NPS NN paragraphs 5.17-18:

'It is very unlikely that the impact of a road project will, in isolation, affect the ability of Government to meet its carbon reduction plan targets. However, for road projects applicants should provide evidence of the carbon impact of the project and an assessment against the Government's carbon budgets.'

The Government has an overarching national carbon reduction strategy (as set out in the Carbon Plan 2011) which is a credible plan for meeting carbon budgets. It includes a range of non-planning policies which will, subject to the occurrence of the very unlikely event described above, ensure that any carbon increases from road development do not compromise its overall carbon reduction commitments. Therefore, any increase in carbon emissions is not a reason to refuse development consent, unless the increase in carbon emissions resulting from the proposed scheme are so significant that it would

have a material impact on the ability of Government to meet its carbon reduction targets.'

2.1.4 Regarding the potential cumulative effects of the Scheme on climate in combination with other road improvement schemes, the NPS NN (paragraph 3.8) states:

'The annual CO₂ impacts from delivering a programme of investment on the Strategic Road Network of the scale envisages in 'Investing in Britain's Future' amount to well below 0.1% of average annual carbon emissions allowed in the fourth budget. This would be outweighed by additional support for ULEVs also identified as overall policy.'

2.1.5 For the purposes of this calculation the road user vehicle emissions have been calculated for 2024 using the traffic data for the opening year 2022 and emissions factors for 2024. Traffic emissions were calculated in the same way as described as in the ES (paragraph 5.5.30 APP-027) and were calculated for all road links in the section of traffic model, including those in the affected road network.

2.1.6 The same assumptions for maintenance and operational energy use have been applied as described in the ES (paragraph 14.1.5.10, APP-036). Total construction emissions have not changed from what was presented in the ES (paragraph 14.1.10.5, APP-036), but for the purposes of this calculation have been assumed to be split between the third and fourth carbon budget periods to the same degree as the construction timeline, i.e. one third in the third budget period, and two thirds in the fourth budget period.

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