

M25 junction 10/A3 Wisley interchange

TR010030

9.76 Response to Ockham Parish Council's comments on climate change at Deadline 5

Rule 8(1)(c) (i)

Planning Act 2008

Infrastructure Planning (Examination Procedure) Rules 2010

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Infrastructure Planning

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Development Consent Order 202[x]

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1. Climate change implications of the Scheme as raised by Ockham Parish Council

1.1.1 The issue of climate change was raised in Ockham Parish Council's response to the Examining Authority's Second Written Questions [REP5-041], in which they stated:

"We robustly challenge the viability of the entire project in light of environmental considerations. Following the Court of Appeal's ruling (27.02.20) that the government's decision to allow the expansion of Heathrow was unlawful because it did not take climate commitments into account, we question the model upon which the HE M25J10/A3 has been based. Has the government commitment to cut net carbon emissions to zero by 2050 been incorporated into this project? Notwithstanding the aspiration that roads will be increasingly populated by electric and hydrogen cars, there is an environmental impact in the manufacturing of the batteries required to operate these vehicles and this fact must also be taken into consideration. It is also clear from the latest research (Which Feb 2020) that the newer models of cars emit much greater quantities of CO2. It is essential that the Paris Climate Agreement is taken into account and that the government complies with its statutory duties."

1.1.2 The assessment of the Scheme has been undertaken in accordance with Government guidance, including Highways England's Design Manual for Roads and Bridges (DMRB), and is in line with national policy applicable at the time of the assessment. The Climate Change Act 2008, which was amended in 2019 following the Paris Agreement (ratified in 2016), requires *"the Secretary of State to ensure that the net UK carbon account for the year 2050 is 100% lower than the 1990 baseline"*.

1.1.3 To meet this target, the Secretary of State sets "carbon budgets" for five-year periods. These reduce gradually to act as stepping-stones to the overall reduction. The UK has met both its first and second carbon budgets, covering the period between 2008 and 2017, and is on track to meet the third carbon budget (2018 to 2022). This would ensure emissions are 37% below 1990 levels. Carbon budgets are currently set up to 2032, with the remaining budgets beyond this yet to be agreed. It is up to the Government as to how it meets its carbon budgets. An assessment was undertaken for the Scheme, to determine its contribution to the relevant carbon budgets as set out in law (Chapter 15 of the Environment Statement [APP-060]). It was found that during construction, and operation in the Opening Year and Design Year, the contribution of the Scheme is minimal (<0.004% of the 3rd carbon budget) and the Scheme is unlikely to have a material impact on the Government meeting its budgets.

1.1.4 The carbon dioxide emissions which are calculated from the operational traffic are derived from DEFRA's emissions factors toolkit (EFT). This provides emission factors up to 2030, consistent with those in the National Atmospheric Emissions Inventory (NAEI). Post 2030, emission factors are assumed to remain the same, which is clearly a conservative assumption and will lead to overestimates in emissions in years later than 2030. Furthermore, the emission factors do not take into account the changes in fleet projections that would be expected with the government's latest intentions to ban the sale of new petrol,

diesel and hybrid cars from 2035. The change to the Climate Change Act would not alter the emissions calculations currently provided in the ES, as they are based on the most up to date datasets available at the time.

- 1.1.5 The UK Government has acknowledged that average emissions of CO2 from newly registered cars have been increasing since 2016, as a result of an increase in the sales of larger cars, and petrol cars (see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800502/vehicle-licensing-statistics-2018.pdf). However, switching to alternatively fuelled emission vehicles is the key driver to reducing CO2 emissions in the long term, as demonstrated by the analysis undertaken for the Road Traffic Forecasts 2018 report (figure 40 of https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834773/road-traffic-forecasts-2018.pdf). Sales of ultra low emission vehicles have been increasing year on year, in 2018 accounting for 2.1% of all new vehicle registrations. Sales of these vehicles are expected to continue to grow.
- 1.1.6 The manufacture of batteries for vehicles, or any other vehicle component, is outside the scope of the assessment as set out in the DMRB.

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