

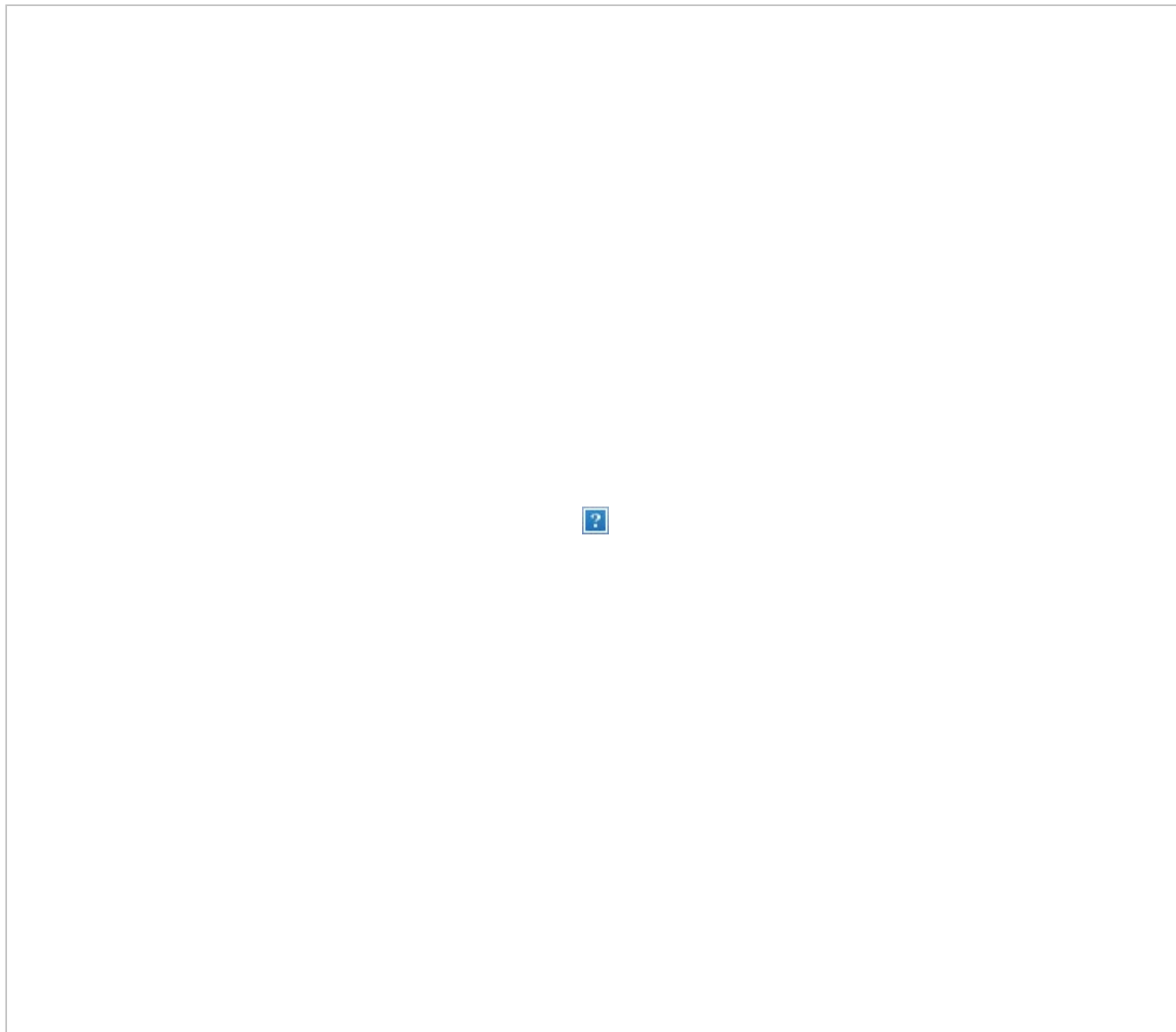
From: [REDACTED]
To: [Lower Thames Crossing](#)
Cc: [REDACTED]
Subject: Implications for LTC of change in Government policy - decision to delay the ban on new diesel and petrol cars from 2030 to 2035
Date: 28 September 2023 14:59:12
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear LTC Team,

Whilst I am sure that this has already been drawn the ExA's attention, we would appreciate them formally considering whether this change in national policy impacts on the LTC technical work.

We are asking because we think it does:

[TR010032-001587-6.1 Environmental Statement Chapter 15 - Climate.pdf \(planninginspectorate.gov.uk\)](#)



i.e. maybe it doesn't underestimate

Set out in table 15.3 for 'Do minimum' and 'Do Something'



Maybe not worse case after all

Regards

Wendy

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the remainder of the 60-year operational assessment, ignoring further increases in zero emission vehicle use beyond that point.

- 15.3.39 The future baseline GHG emissions were forecast using the TAG GHG Workbook (DfT, 2022a) and EFT v11 (Defra, 2021), which includes forecasts of the mix of vehicles (petrol/diesel/electric) in the fleet, and engine fuel efficiency up to 2050. The uptake rates of electric vehicles in EFT v11 are aligned to the penetration rates described in worksheet A1.3.9 of the TAG Databook (DfT, 2022b). The worksheet refers to assumptions made for the road emissions component of 'Energy and Emission Projections (EEP): Net Zero Strategy Baseline' (BEIS, 2022). The Net Zero Strategy baseline does not reflect the policy commitments set out within DfT's Transport Decarbonisation Plan (DfT, 2021a). This means that the TAG Databook underestimates the proportion of the vehicle fleet that will be electric in the future.
- 15.3.40 It is therefore considered that using the TAG GHG Workbook (DfT, 2022a), with input from the TAG Databook (DfT, 2022b), and EFT v11 (Defra, 2021) overestimates GHG emissions.
- 15.3.41 To address the gap between the current assessment guidance and government policies, the DfT has approved a sensitivity test to review the potential impact that new policy measures set out within the Transport Decarbonisation Plan (DfT, 2021a) will have on the Project's road-user emissions. This is based on projections of the rate of improvement in decarbonising domestic transport stated in the Transport Decarbonisation Plan and presented on Plate 15.1. The sensitivity test was applied to CO_{2e} emissions calculated for the future baseline scenario (without the Project). There is uncertainty of policy success, represented by the width of the Decarbonising Transport projection in Plate 15.1, and therefore an upper and lower bound of the sensitivity test has been presented throughout this chapter to provide a more realistic representation of the GHG emissions during the operation phase.

Operational phase

- 15.3.59 The operation or 'use' stage included emissions resulting from maintenance (including repair, replacement and refurbishment activities), mechanical and electrical energy use (for example tunnel lighting, tunnel services buildings and ventilation system), as well as the net variation in emissions from vehicle journeys (also referred to as 'road-user GHG emissions') in the Project's validated transport model.
- 15.3.60 The road-user GHG emissions were calculated using the outputs from the TAG GHG Workbook (DfT, 2022a) and EFT v11 (Defra, 2021). This covers a 60-year appraisal period from the 2030 opening year of the Project.
- 15.3.61 In line with the method described to forecast the future GHG emissions baseline, a sensitivity test was applied to CO₂e emissions calculated for the Project's road-user GHG emissions to address the gap between the current assessment guidance (TAG GHG Workbook (DfT, 2022a) and EFT v11 (Defra, 2021)) and the effect of the Government's Transport Decarbonisation Plan (DfT, 2021a).
- 15.3.62 The Project GHG emissions have been presented as a worst-case impact derived from the TAG GHG Workbook (DfT, 2022a) and EFT v11 (Defra, 2021) method. The outputs of the Transport Decarbonisation Plan sensitivity test have been included. Emissions from the sensitivity test are presented with a lower and upper bound and would provide a more realistic representation of likely GHG emissions from future road users of the Project.
- 15.3.63 As explained under the 'scope of the assessment' heading above, the end of life (decommissioning) stage was excluded from the GHG emissions impact assessment.

Table 15.15 Operational phase GHG emissions (Do Something scenario)***

Emission source		2016 Existing baseline (tCO ₂ e)	2030 Opening year (tCO ₂ e)	2045 design year (tCO ₂ e) (% change from opening year)	60-year appraisal period** (tCO ₂ e)
Operation and maintenance, including repair, replacement and refurbishment		N/A	3,036	0	30,613*
Road-user emissions	TAG GHG Workbook / EFT v11****	8,869,800	8,993,269	6,974,840 (- 22%)	419,071,785
	Transport Decarbonisation Plan upper bound	N/A	8,396,935	1,445,287 (- 83%)	100,227,686
	Transport Decarbonisation Plan lower bound	N/A	5,675,995	507,118 (-91%)	44,799,689
<p>* Zero carbon maintenance (maintenance, repair and replacement) from 2040 and zero carbon operations throughout the operational phase of the Project were assumed, in line with the Net zero highways plan (National Highways, 2021a)</p> <p>** It should be noted that the National End Trip Model (NTEM) Version 7.2 (DfT, 2017) was used. 2051 is the final year of the DfT traffic growth forecasts. Therefore, GHG emissions are at a level rate from 2051 to 2089 for the remainder of the 60-year operational assessment.</p> <p>*** The presented numbers are the result of model calculations. They should still be considered as estimates however.</p> <p>**** TAG GHG Workbook (DfT, 2022a) and EFT v11 (Defra, 2021)</p>					

15.6.14 Similarly, to the Do Minimum scenario presented in Table 15.10, the data shows a trend of reduced emissions between the 2030 opening year and the 2045 design year, demonstrating the effect that the increased uptake of electric vehicles will have on road-user GHG emissions. These reductions are greater when taking into consideration the net zero policy of the Transport Decarbonisation Plan (DfT, 2021a), showing a reduction of up to 91% at the lower bound estimate.