Response to:

The Examining Authority's Written Question: Q6.1.11 General climate change and policy

for the

M3 Junction 9 Improvement Examination 2023

1. Introduction

Transport Action Network (TAN) submitted a Relevant Representation (RR) on the DCO application for the M3 Junction 9 Improvement scheme and registered as an Interested Party (IP).

In the Examining Authority's written questions and requests for information (ExQ1), issued on 25 May 2023, TAN has been asked to respond to Written Question 6.1.11 on carbon emissions:

> *The ExA notes that the Transport Action Network and Dr Andrew Boswell comment that the Proposed Development should be compared against local and regional transport carbon budgets. Please could these parties suggest how such budgets could be identified, taking into account that the Government has not issued any forecasts of cumulative carbon emissions at a scale below the national level.*

2. How local and regional transport carbon budgets could be identified.

2.1 Regional carbon budgets

While the Government has not set regional carbon budgets, sub-national transport bodies have done work in this area. In this case, Transport for the South East (TfSE) has determined to reach net-zero by 2050 at the latest[1], aware that some authorities within the South East have more ambitious targets. While not setting a budget as such, TfSE did extensive analysis of regional transport carbon emissions for its Strategic Investment Plan (SIP), adopted in March this year. TfSE's analysis showed that with the full programme of transport infrastructure proposals listed in the SIP they would struggle to decarbonise quickly enough[2]. That programme included this scheme on the M3.

There is also no reason why regional carbon budgets from the work of other respectable bodies, such as the Tyndall Centre for Climate Change research at the University of Manchester, cannot be used to give a sense of the impact at a regional level. While its budget for the South East is based on the old Government office regions, the TfSE region does not include Oxfordshire and Buckinghamshire. However, it is straightforward enough to

[1] Strategic Goals (page 57), Transport Strategy - TfSE (June 2020)

[2] Page 71, Transport Decarbonisation Thematic Plan - TfSE (June 2022)

calculate a carbon budget for the TfSE region by combining the relevant local authority budgets. This is perfectly possible and the use of Tyndall is explicitly mentioned in the Institute for Environmental Management Association (IEMA) guidance on assessing the significance of GHG emissions, published in February 2022[3]. The IEMA guidance also states that national carbon budgets are only "a starting place" for determining the significance of carbon emissions, and explicitly recommends further contextualisation by comparisons with local and regional budgets.

2.2 Local carbon budgets

While the Government has not set local carbon budgets, the Tyndall Centre for Climate Change research at the University of Manchester has produced carbon budgets for every local authority in the UK. These are evidence based budgets based on each part of the UK making a fair contribution to the Paris Agreement.

The carbon budget for energy usage (which includes transport user emissions) in the Winchester City Council area[4] for the fifth carbon budget (2028-2032) 0.8 MtCO2 and the 6th carbon budget (2033 - 2037) 0.4 MtCO2. The Tyndall Centre notes that "*The recommended budget is the maximum cumulative CO2 amount we consider consistent with Winchester's fair contribution to the Paris Agreement.*"

There is no reason why National Highways could not do a comparison to provide the full context and significance of the scheme which cannot be ascertained by a comparison with UK wide carbon budgets for the whole economy. After all, no other metric is compared in such a way that diminishes its importance and provides little useful context for decision makers.

3. Significance of the carbon emissions from the M3 Junction 9 scheme

The Applicant issued a revised Climate chapter of its Environmental Statement (REP1-006) on 6 June 2023[5] which significantly increased the predicted emissions resulting from the scheme's construction and operation (without explaining the reasons for these increases). From the revised Table 14.7 in Chapter 14, the total additional carbon emissions for the fifth carbon budget are given as 17,055 tCO2 and for the sixth carbon budget the same. Setting aside the fact that these figures are identical, suggesting an error in the table, given that in

[3] Assessing Greenhouse Gas Emissions and Evaluating their Significance, 2nd Edition, Institute of Environmental Management & Assessment (IEMA), (February 2022)
[4] Tyndall Centre Carbon Budget Report, Setting Climate Commitments for Winchester (June 2023): [redacted]
[5] https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010055/TR010055-000569-M3J9_6.1_Environmental%20Statement%20Chapter%2014%20Climate%20(Rev%201)%20(tracked).pdf

Table 14.6 the additional emissions are shown as increasing from 2027 to 2042, this represents over 2% of Winchester City Council's area carbon budget (5th carbon budget period) and over 4% of Winchester City Council's area carbon budget (6th carbon budget period), possibly more given the error above.

These figures we would suggest are significant and will make it much harder for Winchester to decarbonise quickly enough. We would also question the validity of deducting land use benefits from the emissions totals, certainly for the first 5 - 10 years before any planting has become established, as it takes a while before plants and trees can really sequester carbon in any real quantity. That means that the impact of the scheme will likely be greater in the fifth and sixth carbon budgets than is being portrayed. These are the very carbon budgets during which urgent action is needed.

4. Conclusion

Setting aside any possible concerns about Do Minimum traffic level projections being higher than are realistic given the traffic constraints in the area and the tendency for projections to overstate background growth, which would underplay the impact of the scheme, these revised figures represent a significant uplift in carbon emissions. When compared to carbon budgets for Winchester City Council's area, these are seen to be significant and not some small fraction of a percentage.

Given the carbon budget calculations have been done by a reputable establishment (the Tyndall Centre), we can see no reason why their energy carbon budgets cannot be used to help give greater context. This can only be helpful for decision makers in understanding the true impact of this scheme.

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Transport Action Network provides free support to people and groups pressing for more sustainable transport in their area and opposing cuts to bus and rail services, damaging road schemes and large unsustainable developments

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