

# **A66 Northern Trans-Pennine Project**

**TR010062**

## **7.49 Deadline 9 Submission on Climate Matters**

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**7.49 DEADLINE 9 SUBMISSION ON CLIMATE MATTERS**

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<b>Author:</b>	A66 Northern Trans-Pennine Project Team, National Highways

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## **1 Deadline 9: Submission on Climate Matters**

- 1.1.1 This is the Applicant's response to Deadline 8 submissions received from Climate Emergency Planning and Policy (CEPP) [REP8-087] and [REP8-089] and Dr Mary Clare Martin [REP8-082].

## **2 Applicant's response to Deadline 8 submission of CEPP**

### **2.1 Introduction**

- 2.1.1 This is the Applicant's response to both the Late Deadline 8 Submission - Comments on any further information/submissions received by Deadline 7 [REP8-087] and Late Deadline 8 Submission - Principal Areas of Disagreement Summary Statements (PADSS) [REP8-089] of CEPP; the substance of the points in both documents are addressed in this response in order to avoid unnecessary duplication.
- 2.1.2 In order to be of assistance and to provide a structured response for consideration by the Examining Authority (ExA) the Applicant adopts a thematic approach which, where possible, follows the structure adopted by the Applicant in its Deadline 5, Applicant's Response to Deadline 3 and 4 [REP5-030] submission.
- 2.1.3 Similar to its [REP5-030] submission, the Applicant considers that it has previously addressed many of the comments made by CEPP in [REP8-087] and [REP8-089]. Accordingly, the Applicant sets out in this response where it has previously provided a response, in order to act as a signpost to readers.
- 2.1.4 By way of overarching comment, and as noted by the Applicant in its Deadline 8 Submission on Climate Matters [REP8-076], CEPP indicated at Deadline 7 [REP7-198] that it intended to make submissions on recent Government policy papers, namely "Powering Up Britain" and the "Carbon Budget Delivery Plan". The Applicant notes that much of CEPP's Deadline 7 submission [REP8-087] is a generalised commentary on these two new Government policy papers (referring to them as the "Net Zero Strategy" or the "NZS") that has not been particularised to the A66 Northern Trans-Pennine (A66NTP) Project.
- 2.1.5 As the Applicant set out in its [REP8-076] submission, to the extent that CEPP seeks to (in any submission in respect of the A66NTP Project) challenge the lawfulness of these new policy documents, the Applicant's position is that the consideration of the Application for development consent for the A66NTP Project is not the proper forum in which to make submissions of that nature. As CEPP will be aware, any challenges they may have to the Government's policy documents can be made via judicial review of those policy documents directly and that is the appropriate forum to do so. In the absence of any Court Order quashing the adoption of a policy, policy which is material to a decision remains lawful and must be taken into account.
- 2.1.6 Further to that overarching comment, where CEPP's Late Deadline 8 submissions are relevant and relate to the A66NTP Project, the Applicant addresses these below.

## 2.2 Revised Government Policy and Non-Governmental Analysis Documents

### Government Policy Documents – The New Net Zero Strategy

- 2.2.1 In Sections 1 - 3 of [REP8-087], CEPP sets out their Introduction and comments on the revised Net Zero Strategy, comprising two documents, “Powering Up Britain” and the “Carbon Budget Delivery Plan”. As the Applicant notes above in 2 Introduction and in its Deadline 8 submission [REP8-076], to the extent that CEPP seeks to challenge the lawfulness of these new policy documents, the Applicant’s position is that the consideration of the Application for development consent for the A66NTP Project is not the proper forum in which to make submissions of that nature. As CEPP will be aware, any challenges they may have to the Government’s policy documents can be made via judicial review of those policy documents directly and that is the appropriate forum to do so. In the absence of any Court Order quashing the adoption of the revised Net Zero Strategy (or any part thereof), to the extent that these are material to the determination of the DCO application they remain lawful and must be taken into account.
- 2.2.2 To the extent that CEPP’s Deadline 8 submissions relate to the A66NTP Project (as opposed to a more generalised critique of the merits of Government policy), the Applicant understands CEPP’s position on the revised Net Zero Strategy (NZS) to be, by way of summary, that the concerns raised by CEPP with regard to the NZS give cause to question the Applicant’s assessment of significance of greenhouse gas (GHG) emissions as presented in the Applicant’s Environmental Statement (ES) Chapter 7, Climate [APP-050]. The Applicant wholly refutes this suggestion. CEPP’s submissions fail to engage the correct legal and policy tests that apply to the assessment of GHG emissions. In addition, CEPP has failed in their submission to reflect Government policy, which, it is the Applicant’s position, addresses CEPP’s concerns.
- 2.2.3 To the extent CEPP’s NZS submissions seek to challenge the impact assessment of the A66NTP Project, and in so far as it is possible for the Applicant to do so, the Applicant sets out a full and detailed response on these aspects below, in Section 2.3 Assessment of significance of GHG emissions and Section 2.4 The National Networks National Policy Statement (NNNPS) and the draft revised NNNPS.
- 2.2.4 In terms of other aspects of CEPP’s Sections 1-3 on the NZS, and as set out above, the Applicant notes that much of Sections 1-3 of CEPP’s Deadline 8 submission comprise general criticisms of Government policy. These are not properly particularised for the purposes of this Examination and no attempt is made by CEPP to explain how these criticisms are specific or relevant to the A66NTP Project. To the extent, then, that it is possible for the Applicant to provide a reply to these submissions, the Applicant notes that it acknowledged the new NZS in its Deadline 8 submission in a manner that is appropriate to the A66NTP Project (see part 2 of [REP8-076]).

- 2.2.5 In this submission, the Applicant addressed the new Carbon Budget Delivery Plan (CBDP), identifying and commenting upon Table 2 of the CBDP. Table 2 comprises a table of sectoral GHG projections. In its REP8-076 submission, the Applicant addresses this aspect of the CBDP by setting out the assumptions and limitations associated with the Table 2 figures and explaining why, taking into account these assumptions and limitations, the Table 2 figures cannot form the basis of an assessment of GHG emissions. Notwithstanding these assumptions and limitations, the Applicant at Deadline 8 provided a contextualisation of the A66NTP Project's GHG emissions considered against the Table 2 projections, for information purposes.
- 2.2.6 Accordingly, the Applicant's Deadline 8 submission is a properly particularised submission that acknowledges the new NZS and gives the reader fully supported information regarding this aspect of the CBDP in a manner that is specific to the A66NTP Project and this Examination.

### Non-Governmental Documents – Transport Sector policy analysis

- 2.2.7 In Sections 1-3 of their Deadline 8 submission [REP8-087], CEPP sets out various general, non-A66 specific comments on non-Governmental policy documents including the Green Alliance's Net Zero Policy Tracker and "Reverse Gear" by Professor Marsden, as well as repeating comments made on the Climate Change Committee's 2022 Progress Report.
- 2.2.8 Similar to the Applicant's Part A section above, the Applicant notes that much of Sections 1-3 of CEPP's Deadline 8 submission comprise general criticisms of Government policy. These are not properly particularised for the purposes of this Examination and no attempt is made by CEPP to explain how these criticisms are specific or relevant to the A66NTP Project. To the extent CEPP's submissions seek to challenge the assessment of the A66NTP Project, and in so far as it is possible for the Applicant to do so, the Applicant sets out a full and detailed response on these aspects below, in Section 2.3 Assessment of significance of GHG emissions and Section 2.4 The National Networks National Policy Statement (NNNPS) and the draft revised NNNPS.
- 2.2.9 With specific regard to Section 3.4 of CEPP's Deadline 8 submission [REP8-087], the Applicant considered it may be helpful to set out how electric vehicles are factored into its assessment of GHG emissions, as presented in Chapter 7, Climate of the ES [APP-050].
- 2.2.10 The A66NTP assessment considers the projected uptake of electric vehicles (EVs) within the end-user assessment as outlined in Section 7.4 of Chapter 7, Climate of the ES [APP-050] and Table 5: GHG emissions assessment assumptions of Appendix 7.1 Greenhouse Gas Assessment [APP-176]. Using traffic volumes across the Traffic Reliability Area (TRA), the widest road network this traffic modelling is considered reliable, emissions were calculated using the carbon factors provided within the Emissions Factors Toolkit (EFT) v11 (published November 2021). The EFT factors provide assumptions for energy efficiency adjustments and the transition to low emission vehicles up to 2050. For this reason, the assessment is wholly precautionary as it considers the widest verified network and applies assumptions on likely changes to future efficiency and

carbon intensity of road vehicles, informed by UK Government's Department for Environment, Food & Rural Affairs modelled projections.

- 2.2.11 The EFT v11 is the accepted position from Government on future EV uptake in the UK. In addition, the EFT is used by local authorities when assessing local air quality under the duties set out in the Environment Act 1995. Therefore, the EFT projected uptake of EVs is applied generally for air quality and GHG assessments. To the extent then that section 3.4 of CEPP's Deadline 8 submission [REP8-087] is relevant to the A66NTP Project, as opposed to a more generalised critique of Government's position, the Applicant notes that the EFT v11 is the accepted position from Government on future EV uptake in the UK.
- 2.2.12 The Applicant notes Section 3.5 within CEPP's Deadline 8 submission [REP8-087], critiquing the policy approach to estimating traffic growth under the Carbon Budget Delivery Plan. As noted above, to the extent that CEPP seeks to (in any submission in respect of the A66NTP Project) challenge the lawfulness of these new policy documents, the Applicant's position is that the consideration of the Application for development consent for the A66NTP Project is not the proper forum in which to make submissions of that nature. As CEPP will be aware, any challenges they may have to the Government's policy documents can be made via judicial review of those policy documents directly and that is the appropriate forum to do so. In the absence of any Court Order quashing the adoption of a policy, policy which is material to a decision remains lawful and must be taken into account.
- 2.2.13 The Applicant notes that in respect of its other submissions regarding climate law and policy, the Applicant has provided a detailed analysis of climate legislation and policy in Chapter 7 of the ES [APP-050]; on pages 76 – 78 and p. 86 of Appendix 1 to the Applicant's Response to Written Representations made by other Interested Parties [REP2- 017]; and in part 2 of 7.47 Deadline 8 Submission on Climate Matters [REP8-076]

## **2.3 Assessment of significance of GHG emissions**

### **Applicable Law, Policy and Guidance**

- 2.3.1 As mentioned above, the Applicant understands CEPP's position on the revised NZS to be, by way of summary, that the concerns raised by CEPP with regard to the NZS give cause to question the Applicant's assessment of significance of GHG emissions as presented in the Applicant's ES Chapter 7, Climate [APP-050]. The Applicant wholly refutes this suggestion. CEPP's submissions fail to engage the correct legal and policy tests that apply to the assessment of GHG emissions. In addition, CEPP has failed in their submission to meaningfully acknowledge Government policy, which, it is the Applicant's position, appear to address CEPP's apparent concerns.
- 2.3.2 The Applicant has provided detailed written submissions on the assessment of GHG emissions throughout Examination, please see p. 76-78 of Appendix 1 of the Applicant's Response to Written Representations made by other Interested Parties [REP2-017], Section 3 of the Applicant's



- Response to Deadline 3 and 4 Submissions [REP5-030] and paragraphs 6.3.7 and 6.3.8 of the Applicant's Closing Submissions [REP8-074].
- 2.3.3 In brief, the Applicant has set out in detail that the obligation to carry out an assessment of the likely significant effects of the Project on GHG emissions arises from the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). In carrying out its assessment, the Applicant has had regard to the applicable law and policy tests, including under the Climate Change Act 2008, the Planning Act 2008 and the NNNPS, as well as Design Manual for Roads and Bridges (DMRB) LA 114 and IEMA Guide: Assessing Greenhouse Gas Emissions and Evaluating their Significance (2022) (hereafter "IEMA guidance").
- 2.3.4 In particular, it is important to reiterate passages of the IEMA guidance that the Applicant provided in its Response to Written Representations made by other Interested Parties at Deadline 1 [REP2-017] submission that CEPP has not addressed in Examination: "*The specific context for an individual project and the contribution it makes **must be established through the professional judgment of an appropriately qualified practitioner drawing on the available guidance, policy and scientific evidence***"; and, "***It is down to the practitioner's professional judgement how best to contextualise a projects GHG impact***".
- 2.3.5 As noted throughout Examination including in the Applicant's Closing Submissions [REP8-074] the Applicant's assessment of GHG emissions arising from the Project is placed in the context of the UK's statutory carbon budgets. The Applicant's approach therefore contextualises GHG emissions against a baseline trajectory that is consistent with the UK's statutory obligation to meet net zero. The Applicant notes that this approach is in accordance with the NNNPS, DMRB LA 114 and IEMA guidance, as well as with recent infrastructure DCO determinations made by the Secretary of State (please see the examples listed throughout Appendix 1 to the Applicant's Response to Written Representations made by other Interested Parties at Deadline 1 [REP2-017] as well as the A47 Wansford to Sutton DCO, discussed in detail in the Applicant's Closing Submissions and below).
- 2.3.6 CEPP's submissions throughout Examination, including those made at Deadline 8, fail to identify any failure of the Applicant's assessment to comply with applicable law including the requirements for the assessment of likely significant effects under the EIA Regulations. Their submissions also fail to engage in the Applicant's submissions on policy (such as the NNNPS), standards (DMRB LA 114) or guidance (IEMA guidance), including the sections of IEMA guidance quoted above.
- 2.3.7 The Applicant's assessment of GHG emissions has been undertaken in a diligent and robust manner, applying the highly experienced professional judgment of competent and capable practitioners. The Applicant's assessment of GHG emissions complies with all applicable law, policy including the NNNPS (please see more details provided below) and guidance. No submissions made by CEPP properly engage with the submissions made by the Applicant on this point throughout Examination and accordingly, no well-founded or rational challenge to the A66NTP Project's GHG emissions assessment has been made out. The simple fact

is that the A66NTP Project will have a very small impact upon carbon emissions, which are assessed as not significant under the Project's EIA in both construction and operation, and will not materially affect the ability of the Government to meet its climate change obligations. This is particularly the case given the wide range of policy options available to the Government (both within infrastructure planning, planning and more generally (including fiscal approaches)).

## 2.4 The National Networks National Policy Statement (NNNPS) and the draft revised NNNPS

2.4.1 The Applicant notes the comments made by CEPP in part 4 of its Deadline 8 submission [REP8-087] regarding the current NNNPS. The Applicant responds to Section 4 of that submission as follows below.

2.4.2 Under s.104 (2) of the Planning Act 2008, where a National Policy Statement has effect (such as here, where the NNNPS is in effect) the Secretary of State in determining the application for development consent must have regard to (amongst other)... (a) any national policy statement which has effect (i.e. a "relevant national policy statement").

2.4.3 Accordingly, as the NNNPS is the relevant national policy statement, the Secretary of State when determining the A66NTP Project must have regard to the NNNPS. The Applicant's compliance with the NNNPS is set out in document ref 3.9, the Legislation and Policy Compliance Statement [APP-242].

2.4.4 The key assessment and decision-making paragraphs of the NNNPS are provided at paragraphs 5.17 and 5.18, as mentioned in Section 4 of CEPP's Deadline 8 submission [REP8-087]. These paragraphs provide as follows (emphasis added):

*5.17: Carbon impacts will be considered as part of the appraisal of scheme options (in the business case), prior to the submission of an application for DCO. Where the development is subject to EIA, any Environmental Statement will need to describe **an assessment of any likely significant climate factors in accordance with the requirements in the EIA Directive. 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.***

*5.18: 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. The Government is legally required to meet this plan. **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.***

- 2.4.5 The NNNPS remains the extant NPS for the purposes of s.104 (2) of the Planning Act 2008 and the Applicant's assessment of GHG emissions is fully in compliance with the NNNPS. The Applicant's approach in this regard is materially similar to a number of consented infrastructure projects, including the A47 Wansford to Sutton DCO. The A47 Wansford to Sutton DCO and approach has been acknowledged by CEPP in paragraphs 63 and 67 of their Deadline 8 submission. The A47 Wansford to Sutton DCO was granted in February 2023 and has not been judicially reviewed.
- 2.4.6 In March 2023, the Secretary of State published a draft revised NNNPS for consultation. This consultation runs until 6 June 2023, following closure of the Examination for the A66NTP Project. During this ongoing consultation, the Secretary of State has not suspended the extant NNNPS. Accordingly, the extant NNNPS remains in effect and in force.
- 2.4.7 Notwithstanding that the NNNPS remains the relevant National Policy Statement, the Applicant has acknowledged and engaged with the draft revised NNNPS, including in providing an Assessment of Conformity with the Consultation Draft NNNPS ([REP7-161]). The Applicant's conformity with the GHG emissions assessment sections of the draft revised NNNPS is set out on pages 33 – 34.
- 2.4.8 In its Deadline 8 submission Section 4, CEPP sought to challenge the competence of the Secretary of State to grant development consent for transport schemes with additional emissions, on the basis that "any additional emissions from a proposed transport scheme" will be "significant enough to have a material impact on the ability of Government to meet its carbon reduction targets".
- 2.4.9 In the Applicant's view, CEPP's position in its Deadline 8 submission [REP8-087], which is focussed only on transport GHG emissions, transport policy and transport analysis papers, fails to properly take into account the Climate Change Act 2008, the Government's net zero 2050 target, or the 5-yearly carbon budgets. As a consequence, it is the Applicant's position that CEPP's submissions on the NNNPS are incorrect.
- 2.4.10 The Government's 2050 net zero target, as enacted via the Climate Change Act 2008 is to achieve net zero GHG emissions across the UK as a whole. Accordingly, the 5-yearly carbon budgets set total carbon budgets for the economy and industry as a whole. There is no sectoral target – for emissions or otherwise – set under the Climate Change Act 2008 or the 5-yearly carbon budgets.
- 2.4.11 This position is reflected in the sections of the NNNPS quoted above, and are developed in the draft revised NNNPS, which is not addressed by CEPP in their Deadline 8 submission. Whilst the Applicant acknowledges that the draft revised NNNPS is at consultation and may be subject to amendment, the Applicant considers that it can be regarded as indicative of Government intention and that the following extracts support this point (emphasis added):

*5.35: S.1(1) of the Climate Change Act 2008 reflects and puts into effect the UK's Nationally Determined Contributions as set out in the Paris Agreement and sets out that the carbon budgets **are the mechanism by***

***which the net zero target is to be achieved. Consequently, it can reasonably be concluded that an applicant who assesses the carbon impacts of its scheme against the carbon budget is to be taken also to have assessed the carbon impacts of the scheme against the net zero target in the Climate Change Act 2008 and the UK's Nationally Determined Contributions, where the carbon budget is consistent with the Climate Change Act 2008 carbon target and the Nationally Determined Contributions.***

***5.36: The Secretary of State should be content that the applicant has taken all reasonable steps to reduce the total greenhouse gas emissions from a whole life carbon perspective. The Secretary of State should also give positive weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and within the proposed development. However, given the important role national network infrastructure plays in supporting the process of economy wide decarbonisation, the Secretary of State accepts that there are likely to be some residual emissions from construction of national network infrastructure.***

***5.37: Operational greenhouse gas emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that a net increase in operational greenhouse gas emissions is not, of itself, reason to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework. Any carbon assessment will include an assessment of operational greenhouse gas emissions, but the policies set out in chapter 2 of the NPS, apply to these emissions. Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting carbon budgets, net zero and the UK's Nationally Determined Contribution.***

- 2.4.12 The Applicant has set out on p.34 of the Applicant's Assessment of Conformity with Consultation Draft National Networks National Policy Statement [REP7-161] the details of how the A66NTP Project complies with these provisions of the draft revised NNNPS.
- 2.4.13 Accordingly, the Applicant considers the position by CEPP in their Deadline 8 submission fails to take into account the economy wide basis on which the UK's net zero target under the Climate Change Act 2008 is made, a position that is reflected in the NNNPS and the draft revised NNNPS. There is no statutory sectoral budget for transport projects and the CEPP has identified no failure by the A66NTP Project in assessing its GHG emissions against the UK's carbon budgets. Accordingly, with regard to paragraph 70 and 71 of CEPP's Deadline 8 submission [REP8-087], there has been no failure by the A66NTP Project to comply with the Planning Act 2008 s.104 and no challenge on this basis has been rationally or properly made out.

- 2.4.14 Further, paragraph 70 of CEPP’s Deadline 8 submission [REP8-087] is founded upon the premise that “any assumption that the delivery of the Net Zero Strategy is secured is a false assumption.”
- 2.4.15 Section 13(1) of the Climate Change Act 2008 provides that “the Secretary of State must prepare such proposals and policies as the Secretary of State considers will enable the carbon budgets that have been set under this Act to be met.” Thus, the Net Zero Strategy represents the Government’s view of the policy required to enable the carbon budgets to be met. CEPP disagrees. However, unless a Court orders otherwise, a decision maker must proceed on the basis that the Net Zero Strategy will ensure that carbon budgets are met and that, via monitoring the Government will introduce further policy initiatives if and to the extent that that Strategy requires reinforcement in the future. A decision maker is not entitled to disregard lawfully adopted Government policy unless and until it is quashed by the Courts.
- 2.4.16 With regard to section 4 of CEPP’s Deadline 8 submission [REP8-087], the Applicant also wishes to make a point of clarity in respect of s.104 of the Planning Act 2008. The Applicant notes that the Planning Act 2008 states, e.g. that:
- s. 104(3) The Secretary of State must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of subsections (4) to (8) applies.*
- s. 104(4) This subsection applies if the Secretary of State is satisfied that deciding the application in accordance with any relevant national policy statement would lead to the United Kingdom being in breach of its international obligations.*
- 2.4.17 S.104 does not state that the Secretary of State cannot approve a project where they do not have legal certainty that approving the project would not lead to the UK being in breach of its international obligations.
- 2.4.18 To the extent that the latter approach is the interpretation offered and summarised by CEPP, it is not a correct one under s.104 of the Planning Act 2008.

## **2.5 References to ‘errors’ in the contextualisation of emissions**

- 2.5.1 The Applicant notes CEPP’s position and considers that these points have been addressed in the Applicant’s submissions to date; most notably Appendix 1 to the Applicant’s Response to Written Representations made by other Interested Parties [REP2-017] and within Section 3 of 7.33 Application’s Response to Deadline 3 and 4 Submissions [REP5-030].
- 2.5.2 To confirm, the Applicant maintains their position that these submissions are based on a misinterpretation of the assessment provided within ES Chapter 7, Climate [APP-050]. To reiterate, the Applicant’s assessment is highly precautionary, robust and presents an over estimation of the Project’s emissions.

## **2.6 Cumulative Assessment of GHG Emissions**

- 2.6.1 The Applicant notes CEPP's position and considers that these points have been addressed in the Applicant's submission [REP2-017] particularly pages 81 – 84 and in section 3 of 7.33 Applicant's Response to Deadline 3 and 4 Submissions [REP5-030]. Finally, it may be of assistance to direct the Examining Authority to the Applicant's summary on cumulative carbon impact appraisal matters, provided in paragraphs 6.3.11 – 6.3.19 of the Applicant's Closing Submissions [REP8-074].

### **3 Applicant's response to Deadline 8 submission of Dr Mary Clare Martin**

- 3.1.1 The Applicant notes the submission of Dr Mary Clare Martin made at Deadline 8 [REP8-082]. REP8-028 includes comments made on the significance of carbon emissions arising from the Project, on Government carbon emissions targets and noting the submission on these matters made by Dr Boswell (of CEPP) also made at Deadline 8.
- 3.1.2 In response to a comment made by Dr Martin on the significance of the A66NTP Project's carbon (greenhouse gas, or GHG) emissions, the Applicant's assessment identified that there would be no significant adverse effects arising from the Project on GHG emissions, in construction or in operation. Please see the Applicant's assessment presented in detail in Chapter 7 of the ES [APP-050].
- 3.1.3 In response to the remaining elements of Dr Martin's Deadline 8 submission [REP8-082] that cover climate matters, the Applicant notes that it has provided a detailed response on these points within Section 2 above.