Call for Evidence: 7th Carbon Budget[1]

Questions

1. CCC's assumptions behind the budget

- How adequate and deliverable are the CCC's headline assumptions underpinning the 'balanced pathway' (e.g. sectoral reductions, technology deployment, economic circumstances, public behaviour) in ensuring compliance with the UK's statutory carbon budgets under the Climate Change Act, including in light of the new Carbon Budget Delivery Plan?
- Are there critical interdependencies (e.g. between aviation, agriculture, and energy) that could affect delivery of the statutory targets?
- How could the CCC communicate uncertainties and flexibilities in its modelling, while maintaining confidence in the headline pathway and its adequacy for meeting legal requirements?

Assessing the adequacy and deliverability of the CCC's headline assumptions is challenging when the government is sending out such very mixed messages, including in relation to, for example, roads and housing:

Roads

Government is still, for example, approving unsustainable, carbon intensive, high cost, major road schemes, rather than investing the vast majority of transport spend in sustainable passenger and freight transport solutions and active travel. This means that it is unlikely that the required modal shift (and the associated changes to public behaviour) will be possible.

In addition, the well-known phenomenon of induced traffic, which the government's own evidence[2] suggests "*does exist and may be significant in some situations*", results in higher levels of congestion and the consequent carbon emissions.

Government has, for example, approved the emissions intensive Lower Thames Crossing scheme[3], which will not only have a huge carbon and air quality footprint, it will also destroy around 8 hectares of carbon capturing, irreplaceable ancient woodland. Even its mitigation measures are not dedicated wildlife crossings but are designed primarily for cars and the functionality of the road scheme. This approach will not lead to the outcomes the government is seeking.

National Highways[4] believes by offering an alternative route, the Lower Thames Crossing will ease congestion at Dartford by 20%. This small reduction in volume will not counteract the impact of the huge levels of induced traffic, meaning that investing in such schemes will actually increase carbon emissions, rather than reducing them.

No such schemes should be considered in the current climate. Road improvement spend should be focused on repairing and maintaining existing roads.

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[1] https://committees.parliament.uk/call-for-evidence/3752/
[2] https://assets.publishing.service.gov.uk/media/5c0e5848e5274a0bf3cbe124/latest-evidence-on-induced-travel-demand-an-evidence-review.pdf
[3] https://www.kentwildlifetrust.org.uk/blog/lower-thames-crossing
[4] https://www.bbc.co.uk/news/articles/c62kyvge919o

It should be noted that climate mitigation is also impacted by road runoff[5] that is polluting our waterways. This is a significant but under-monitored issue (pollutants like heavy metals, tyre particles, and oils are washed from roads into waterways by rain) and will ultimately increase the funds required to support climate mitigation, with new roads causing additional costs.

Housing

There are three key issues relating to housing policy that are increasing carbon emissions – and will even blow the carbon budget[6]:

1. The policy of unnecessarily building 1.5m new homes when the government's own data[7] shows that there are significantly more homes than households and that this has been the case for many decades.
2. The building of car-dependent sprawl (often 'unlocked' by new roads) which increases carbon emissions. The government should mandate that all new build must follow the Transport for New Homes checklist[8], adherence to which would support achievement of CB7 and would deliver sustainable development.
3. The building of new homes, when the government's focus should be on repair, reuse and regeneration, to minimise the carbon implications of new development, along with a focus on social housing, as set out in our Homes for Everyone report[9].

Communicating the uncertainties and flexibilities in the CCC modelling, must be done sensitively to reduce the amount of consequential misinformation. We would suggest more community involvement in developing both the messaging and in agreeing the means of delivery. More work with schools, for example, may bring benefits as children 'educate' their parents. More citizen panels will make the public feel more able to influence decisions that affect them and their children/grandchildren.

The *"critical interdependency"* is the government implementing policies that support climate mitigation, rather than policies that will blow the carbon budget.

2. Technology choices

- What is the right balance between proven solutions (e.g. EVs, heat pumps) and emerging technologies (e.g. CCUS, engineered removals) to deliver both the scale of ambition required whilst being confident that the measures proposed are deliverable and realistic to meet the obligations of the Climate Change Act?
- What contingency or resilience measures are needed if anticipated technologies or behavioural changes do not deliver at the pace assumed, in order to remain compliant with the statutory trajectory?

[5] https://transportactionnetwork.org.uk/national-highways-toxic-run-off/
[6] A home for all within planetary boundaries: Pathways for meeting England's housing needs without transgressing national climate and biodiversity goals - ScienceDirect
[7] https://www.linkedin.com/pulse/more-homes-than-households-who-we-building-rosie-pearson-3nh2e/
[8] https://www.transportfornewhomes.org.uk/the-project/resources/checklist-for-new-housing-developments/
[9] https://homesforeveryone.org/Homes-For-Everyone-Report.pdf

Best practice project disciplines should be introduced that include both piloting (fully investigating the viability and risks of an exploratory initiative that has no obligation to proceed to full rollout), and trialling (testing the implementation of a committed scheme) for unproven solutions, rather than just proceeding to wholesale funding of such schemes, especially when they may take decades to come to fruition, with other solutions being capable of immediate roll-out.

We seek an evidence-based approach, and one that follows Treasury Green Book guidance to evaluate alternatives, since this enables the consideration of externalities and impacts. The grid upgrade provides a useful example. It is being delivered in the absence of evidence and without adherence to the Green Book. This means that evidence for things like carbon impact are not being assessed or quantified. If they were, we would see very different (and better) solutions. The upgrading of the existing grid, for example, using the most up-to-date technologies would result in a lower carbon impact than building new infrastructure.

This lack of transparent and reliable figures relating to expected emissions is also true of the drive for data centre growth, which will result in a substantial reduction of the benefits of lower emissions from, for example, EVs[10]. With more than 100 data centres planned in the UK, the operational implications of just 10 of these centres would result in additional annual carbon emissions at around the same level as the annual carbon savings expected in one year from the public's switch to electric vehicles.

These issues must be considered when balancing the focus between proven solutions and emerging technologies, and other government initiatives.

The best contingency (in addition to accelerating the roll-out of readily available solutions) is to maximise proven natural solutions, such as restoring our peat mosses and increasing tree planting.

3. Costs, policy choices and economic implications

- How will the costs of delivering CB7 be distributed between households, businesses and regions, and what policies are needed to ensure fairness, resilience, and public support?
- What are the costs of inaction across different sectors and how can these be factored into policy-making? What are the potential cost savings and positive economic impacts of tackling climate change in the long-term (up to 2042 under CB7)?
- What policy choices and governance structures are most critical for ensuring that CB7 both meets the UK's legal requirements under the Climate Change Act 2008 and interacts effectively with the UK's Nationally Determined Contribution (NDC) under the Paris Agreement?

The government must give confidence to the public that there is a genuine attempt to meet the legal requirements. Current policies do not achieve this.

It would not be fair for the government to expect an increase in the contributions that have to be made by the public whilst still introducing and approving schemes that result in increased carbon emissions (such as new road schemes and expanding airports).

[10] https://observer.co.uk/news/business/article/ten-uk-data-centres-could-cancel-ev-emissions-gain

In addition to the government policies mentioned above (sustainable passenger and freight transport and repair, reuse and regeneration of previous development), there should be more emphasis on the carbon contributions of the very wealthy, such as those who use a private jet, those who unnecessarily drive large vehicles (SUVs in urban areas) and frequent flyers.

Business contributions should be aligned to their impact on the carbon budget. If they increase emissions (through for, example, manufacturing processes, or air travel, including businesses whose employees are required to travel by air, and freight that could use water-based travel, as well as the airlines themselves), they should pay a larger contribution than those whose products or services are carbon neutral and do not cause damage to the environment.

In terms of inaction, there is a risk that apathy on the part of the government could lead to a complete loss of opportunity to reduce carbon emissions. Peatmosses, for example, that could be restored to support carbon capture and storage, are currently being destroyed by development. The government should, therefore, introduce policy that places an immediate moratorium to prevent development on any peatmoss that Natural England considers to be irreplaceable and restorable. The government could also introduce a policy which gives an accelerated target for tree planting for each region.

Such an approach would introduce certainty for citizens, developers and businesses, who could invest in, or volunteer with, initiatives to deliver these schemes, bringing both cost savings and economic benefits, locally, regionally and nationally.

Once again, the grid upgrade is also instructive. There are ways[11] to ensure that the upgrade is less harmful and less costly, but these are being ignored in favour of solutions put forward by multinational, shareholder-owned companies, such as National Grid.

4. Behavioural change

- What contribution is behavioural change expected to make alongside technological solutions in meeting statutory targets, and how should government policy support and enable this?
- How might wider government strategies for growth, productivity, and regional development influence emissions trajectories under CB7, and what mitigation is needed to ensure continued compliance with the Climate Change Act?

The inference in the documentation is a huge contribution through behavioural change but there is insufficient focus to encourage this. The government should, therefore, reduce the number of internal flights and increase compensatory rail services. It should also reduce the cost of rail travel to make it much more attractive than either the car or air travel.

The government could also immediately mandate the reintroduction of school bus services to reduce the reliance of parents on car travel during peak periods, which increases congestion and carbon emissions.

Travelling by air should be subject to additional taxes, with frequent flyers and private jet users particularly being targeted.

[11] "Leaders not Laggards" https://drive.google.com/file/d/16QyXScRg8lPFb53cO2gTykBpiciM8fFj/view?usp=drive_link

Rail travel should be made much more attractive for longer journeys, including by increasing the frequency and destination options of travel and (as mentioned above) significantly reducing the cost for a basic ticket. For longer journeys rail could also include family carriages, a sleeper carriage, a meeting room carriage, dining carriage options and decent internet connectivity.

5. Public engagement

- How can the Government engage the public in ways that build understanding, tackle misconceptions, and increase buy-in for the statutory action required under CB7 and Carbon Budget Delivery Plans?
- How could the Government best explain the reasons behind the changes needed to meet CB7, including the costs and lifestyle impacts, and the costs of inaction, in a way that builds understanding, tackles misconceptions and increases public support?
- How can the Government ensure that discussion around the needs for CB7 is based on the latest reliable scientific evidence, and that this is communicated in the widest possible terms?

Effective public engagement needs effective policies. Change will not be delivered if modal shift, for example, cannot be achieved because train journeys are too expensive and bus services are non-existent. Peat mosses cannot be restored if they are concreted over (and either piling or removing the peat will cause a huge carbon emissions event).

Early engagement and following the 'Engage, Deliberate, Decide' process is more effective than attempting to paint a positive story around something that's already been decided (the frequently used 'Decide, Announce, Defend' approach). Ensuring lawfulness of consultation, by following the Gunning Principles[12], will help to increase trust.

Public feedback on renewable energy will not be positive if (what are perceived as dangerous) Battery Energy Storage Systems are inappropriately located near to schools, residences and hospitality venues or if they result in higher costs for electricity due to corporations making excessive profits from extracting and storing energy when it is available and cheap, then charging a much higher cost when it is returned to the grid.

In addition to increasing skills, government should invest in communities to support the delivery of CB7, through volunteering for tree planting, for example, along with the requirement to maintain the planted area (which so often is neglected[13]). Many schools, including those that support senior pupils with special educational needs, would welcome the opportunity to participate in such activities. This could provide them with experience they can use when seeking to enter the employment market, particularly with 'green' jobs.

The Duke of Edinburgh Award[14] recognises that climate change and the environment are two of the most important issues facing us today. Young people provided feedback that they wanted to take action to influence policy around climate change and focus on environmental and sustainability issues as part of their Award activities.

We note some excellent inputs were provided by the citizen panels. More opportunities, such as these, should be made available for the public to be actively involved, particularly to help determine the best way to explain the reasons behind the changes needed to meet CB7, including the costs and lifestyle impacts, and the costs of inaction.

[12] https://www.local.gov.uk/sites/default/files/documents/The%20Gunning%20Principles.pdf
[13] https://www.bbc.co.uk/news/articles/ckglqnnpzgxo
[14] https://www.dofe.org/climate-change-programme/

There is a lot of misinformation in the public domain, some of which is exacerbated by the government's mixed messages, as mentioned above, and in terms of, for example, what constitutes 'sustainable' development, with many public bodies appearing to assume it is only about what materials a construction is made with. Whilst the National Planning Policy Framework (NPPF)[15], paragraph 7, suggests that at a very high level, "*the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs*", this needs to be qualified, in the Annex 2 Glossary, with a clear definition of what actually constitutes 'sustainable development'. It is not sustainable to, for example, develop more car dependent settlements, build on deep restorable peat or other irreplaceable habitats, to significantly increase HGV traffic without provision of a sustainable freight transport solution, or to approve carbon intensive major road schemes rather than sustainable alternatives.

The NPPF should also mandate detailed carbon calculations for each development, that are publicly available and accessible. A key factor in the approval of all development **must** be the consideration of lower carbon alternative options. These should be included at the Local Plan stage when allocating sites, and also in the supporting documentation for a planning application.

Funding must be made available to ensure the scientific evidence is kept up to date and has regard to the progress made in new technologies and other solutions. Whilst academia will be heavily involved in ensuring that discussion around the needs for CB7 is based on the latest reliable scientific evidence, all such evidence should be in the public domain, written in terms that are accessible to the layman and fully available for scrutiny and analysis.

In supporting the communication of such data in the widest possible terms, more interaction with schools and colleges is needed, such scrutiny could be included in the curriculum.

6. Parliamentary scrutiny

- What role should Parliament play in scrutinising delivery against existing commitments (CBs 4–6 as set out in the Carbon Budget Delivery Plan) as well as the Government's proposals for CB7, given the statutory duties under the Climate Change Act?
- When should the CB7 Impact Assessment and supporting analysis be published, relative to the draft Budget, to allow for effective pre-legislative scrutiny by Parliament?
- What factors and evidence should be included in the Impact Assessment (e.g. adequacy, deliverability, costs, benefits, sectoral pathways, interactions with NDCs) to enable robust scrutiny of compliance with the Climate Change Act and Paris Agreement obligations?
- What tools, mechanisms, or reporting structures would strengthen ongoing parliamentary oversight and accountability for statutory carbon budget delivery?

15 https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

Parliament must ensure that changes in the governing political party do not result in flip-flopping of policies related to climate change. The lack of progress in securing more sustainable developments and in implementing policies that specifically address climate mitigation (such as those mentioned above) is a betrayal of future generations.

Strengthening the planning system to ensure full regard **must** be given to the implications of development on climate mitigation, including ensuring that there are detailed carbon calculations and a genuine consideration of alternatives. Any exceptions (such as proposals to develop on peatmosses that are considered to be restorable by Natural England or where the level of increased carbon emissions are so large that they will impact the achievement of net zero) should require approval by the Secretary of State.

Kind regards

Marj Powner

Vice Chair

Community Planning Alliance

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About the Community Planning Alliance

The Community Planning Alliance is a national umbrella group for over 700 communities, all are campaigning against inappropriate development in their areas, and all disagree that decisions are being made in the 'public interest'. We have extensive knowledge and experience of the planning system, and our aims include seeking increased community participation, better environmental protections and the right homes and infrastructure in the right places.