

**NOTE TO THE INSPECTORS**

**RE: THE NET ZERO STRATEGY**

**ON BEHALF OF NORTH SOMERSET COUNCIL**

**Introduction**

1. North Somerset Council (NSC) has set out its submissions in relation to climate change considerations and the proposed development.
2. The publication of the Government's net zero strategy simply reinforces the strength of those submissions.

**The Absence of an Adopted Assessment**

3. NSC submitted in closing that the Government has not published an adopted assessment which demonstrates that all airports can grow as they desire consistent with ensuring the attainment of the 6<sup>th</sup> Carbon Budget target and net zero 2050. The Net Zero Strategy does not change this position since it does not set out any such adopted assessment. Moreover, the Net Zero Strategy does not give any indication that such an assessment has in fact been undertaken by the Government, even if it has not yet been published or adopted.
4. In closing NSC submitted that the aviation sector will be one of the sectors which is unable to attain net zero without reliance upon Greenhouse Gas Reduction (GGR) measures. It submitted that in order to demonstrate that all airports can grow as they desire the Government had to identify the amount GGR capacity which will be available and identify how much of that capacity it is cost-effective to ascribe to aviation as opposed to other sectors<sup>1</sup>. NSC submitted that the Government had not reached any concluded view of the amount of GGR capacity that will be available as at the 6CB period or at 2050. Accordingly, there is no evidence which establishes that sufficient GGR capacity will be available to off-set the gross emissions from the aviation sector if all airports are allowed to expand.<sup>2</sup>
5. The Net Zero Strategy explains:

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<sup>1</sup> NSC closing submissions paragraph 71 and following.

<sup>2</sup> NSC closing submissions paragraphs 73-74

“We must also acknowledge that sectors such as industry, agriculture and aviation will be difficult to decarbonise completely by 2050. Greenhouse gas removals (GGR) are therefore essential to compensate for the residual emissions arising from the most difficult activities to reduce or eliminate from within polluting sectors.”<sup>3</sup> (emphasis added)

6. Thus, the Government recognises that attainment of net zero for some sectors, including the aviation sector, is dependent upon the delivery of GGR capacity.

7. The Net Zero strategy also recognises that barriers to delivery and uncertainties exist:

“This evidence suggests that the next decade will be critical and several GGR solutions, such as Direct Air Capture, will have to be developed or scaled-up significantly during the late 2020s and early 2030s to contribute effectively to later carbon budgets and our net zero target, as well as to build our evidence and experience in the sector.”<sup>4</sup>

8. The Strategy does not contain any assessment or discussion of the degree of likelihood of the GGR capacity required actually being delivered.

9. The Strategy explains:

“Based on the current evidence base and projects in the pipeline, our analysis indicates that engineered removals would be expected to deploy from 0 MtCO<sub>2</sub> today to at least 5 MtCO<sub>2</sub> by 2030 and to around 23 MtCO<sub>2</sub> by 2035, with higher and lower deployment possible depending on sector-specific and wider economy developments.”<sup>5</sup>

10. In fact, the Charts and Tables supporting the Strategy show as the lower bound of GGR capacity available in 2035 is forecast as just 11 MtCO<sub>2</sub> per annum. i.e. less than half of the 23 MtCO<sub>2</sub> referred to in the main text of the Strategy. Yet there is no discussion of this uncertainty or what may be necessary if it is the lower forecast GGR capacity that materialises as at 2035.

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<sup>3</sup> Net Zero Strategy page 184

<sup>4</sup> Net Zero Strategy p187 paragraph 8

<sup>5</sup> Net Zero Strategy p188 paragraph 10

11. It will be remembered that even the “ambitious” Jet Zero consultation paper preferred scenario 2 requires 21 MtCO<sub>2</sub> to deliver net zero<sup>6</sup> as at 2050.

12. The Net Zero Strategy explains that:

“By 2050, deployment of engineered removals at large scale, between 75 and 81 MtCO<sub>2</sub> per year, **will be needed** to help compensate residual emissions.” (emphasis added)

13. The wording here is important. The Strategy identifies what “will be needed” but it does not identify what Government’s current view on what will in fact be provided as at 2050 or how. In other words, the Net Zero Strategy does not demonstrate that the GGR capacity that is “essential” to enable all airports to expand as they desire consistent with 6CB and/or net zero 2050 will in fact be delivered at the scale required to ensure attainment of those climate change targets.

14. The Charts and Tables published alongside the Net Zero Strategy identify a lower bound for GGR capacity of 75.4 MtCO<sub>2</sub> as at 2050. The Charts and Tables identify that as at 2050 there could be residual emissions as follows:

- a. Power – 3 MtCO<sub>2</sub>;
- b. Fuel supply – 7.5 MtCO<sub>2</sub>;
- c. Industry – 10.2 MtCO<sub>2</sub>;
- d. Heat and Buildings – 1.7 MtCO<sub>2</sub>;
- e. Transport (including aviation) – 34.9 MtCO<sub>2</sub>; and
- f. Agriculture – 20.6 MtCO<sub>2</sub>.

15. That is a total of 77.9 MtCO<sub>2</sub> as at 2050 compared to a lower bound for available GGR capacity of 75.4 MtCO<sub>2</sub>. This demonstrates that on the Government’s own figures that there could be insufficient GGR capacity to deliver the abatement required.

16. It follows that the Net Zero Strategy does not demonstrate that expansion of all airports can be permitted on a basis that will **ensure** that 6CB targets and net zero 2050 will be attained.

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<sup>6</sup> CD9.135 p14 graph showing scenario 2

17. NSC explained the consequences of this in its closing submissions; a need to choose which airports can expand and which may not, cannot be ruled out at the present time. Those submissions remain good notwithstanding the publication of the Net Zero Strategy.

### **The Aviation Sector**

18. In relation to aviation specifically, the Net Zero Strategy cross-refers to the Jet Zero consultation<sup>7</sup>. The Net Zero Strategy contains no new assessment data relevant to the aviation sector. Further, it does not seek to impinge upon that consultative process and so does not adopt any policy in that regard<sup>8</sup>. It does not then reach any concluded view on the path to net zero for the aviation sector and does not demonstrate that all airports can expand as they desire consistent with ensuring the attainment of the 6CB or net zero 2050.

19. Indeed, the Net Zero Strategy does not identify a sectoral target for the aviation sector for any of the carbon budget periods or for 2050.

20. NSC has set out its submissions in relation to the Jet Zero consultation in its closing submissions and the content of the Net Zero Strategy does not affect those submissions.

### **Zero Emissions Aircraft**

21. One point to note, however, is that the Net Zero Strategy appears to emphasise zero emission aircraft in a way which the Jet Zero consultation paper does not<sup>9</sup>. It will be remembered that the preferred scenario in Jet Zero includes only a 2 MtCO<sub>2</sub> per annum reduction as a result of zero emissions aircraft. Indeed, in relation to Scenario 2, the Jet Zero Evidence and Analysis document states:

“While zero emission aircraft enter the fleet in 2035, these have a **minimal impact** on total emissions in 2050.” (emphasis added)

22. In his Foreword, however, the Prime Minister states that in 2050 “our planes will be zero emission allowing us to fly guilt-free”. That statement is wholly inconsistent with the preferred scenario which is currently the subject of consideration by the Government. The Council is very concerned indeed that the Prime Minister does not understand the approach that is set

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<sup>7</sup> Net Zero Strategy p161 paragraphs 40-43

<sup>8</sup> Since to do so would be unlawful prior to the outcome of that consultative process.

<sup>9</sup> See p161 para 41 for example

out in the consultation material provided by the Government – it would seem to be misleading to suggest to the public that they will be flying in zero emission aircraft in 2050 when the Government’s preferred strategy states that these aircraft will have a minimal effect on emissions in 2050.

### **The CCC Response**

23. The CCC responded to the Net Zero Strategy<sup>10</sup> by pointing out that:

“There is less emphasis on reducing demand for high carbon activities than in the CCC’s scenarios. The Government does not include an explicit ambition on diet change, or reductions in the growth of aviation, and policies for managing travel demand have not been developed to match the funding that has been committed. These remain valuable options with major co-benefits and can help manage delivery risks around a techno-centric approach. **They must be explored further with a view to early action.**” (emphasis added)

24. Thus, the CCC recognises that the Government has not fully explored the issues associated with reductions in the growth of aviation and policies for managing travel demand. This reflects precisely the submissions made by NSC that there has been a failure to assess whether the capping of capacity of airports would be a cost-effective means of delivering carbon reduction<sup>11</sup>.

### **Implications for MBU and the APF**

25. There is nothing in the Net Zero Strategy which establishes that MBU or the APF are up to date. Indeed, neither document is mentioned or referenced in the Net Zero Strategy. Accordingly, the submissions made by NSC in closing, that MBU and the APF are out of date and of limited, if any, weight in respect to any support for airport expansion which they may contain, holds good.

### **Conclusion**

26. To summarise, the Net Zero Strategy does not affect the submissions made by NSC in relation to climate change; rather it highlights the uncertainties associated with the delivery of GGR capacity upon which the aviation sector relies in order to attain net zero. That uncertainty simply reinforces the force of the submissions made by NSC.

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<sup>10</sup> [Climate Change Committee \(theccc.org.uk\)](https://theccc.org.uk)

<sup>11</sup> NSC closing submissions paragraph 6 and following.

27. The position remains that there is no basis upon which it can be concluded that planning permission for the proposed development can be lawfully granted. To grant planning permission is premature. It has not been demonstrated (and BAL itself is unable to demonstrate) that a grant of planning permission will not have a material effect on the Government's ability to meet the 6CB target or net zero.

5 November 2021