

31st December 2021

Dear Members of the WYCA Transport Committee

West Yorkshire's future transport decarbonisation FAILURE

I'm writing to you on behalf of the West Yorkshire network of climate and social justice organisations - which includes the Friends of the Earth local groups in each district, but extends beyond that - who have made repeated representations in recent years about the urgent need to decarbonise transport in our region. Most recently we submitted to Mayor Tracy Brabin an audit of her Climate and Biodiversity Plan published in October, and a response to the reply she provided in December to the Action Network petition we submitted opposing the Combined Authority's existing programmes for increasing road capacity, and the proposed expansion of Leeds Bradford Airport.

Both of those documents are **attached** for your information and within them you'll see that the requirement for transport to decarbonise is **the** critical feature of the representations we are now making to the Mayor and Combined Authority. This will therefore be at the centre of the campaigning we'll be undertaking in each WY district and with the Mayor over the next 6 months to mark the 3rd anniversary of the 'climate emergency' declarations made between January-June 2019.

The facts behind our analysis are stark. According to government data, by (pre-Covid) 2019 transport emissions made up 40% of the total WY carbon budget (up from 28% in 2005); and had not reduced at all over the previous decade (2009: 4.1m tonnes; 2019: 4.3Mt¹). According to the WYCA carbon emissions reduction pathways study (CERP *July 2020* which properly includes aviation) transport emissions in its 'Maximum Ambition' scenario must fall from 4.9Mt in 2020 to 2.3Mt in 2030, a reduction of -53% that requires CO2 removals averaging 250,000 tonnes every single year.

We are entitled to ask: given the non-delivery of any transport decarbonisation in the 2010s, how will this extraordinary amount of emissions reduction required in the 2020s be achieved? It is **the responsibility of the WYCA Transport Committee to take the lead in facing up to this decarbonisation challenge** but our submission to you is that so far **you have failed to discharge that responsibility** - for these reasons:

- In the 18 months since the CERP study was published you have not considered or discussed a single report acknowledging the quantified scale of the transport emissions tonnage reductions it disclosed (as summarised above²), or scoping how annual reductions of that magnitude could be attempted. Because of this lack of diligence, and inaction, if it were to be the case that transport emissions only achieve the CERP Baseline scenario reduction by 2030 (down to just 4.1Mt) then any prospect of responding to 'climate emergency' across the total WY carbon budget collapses.
- In your two meetings since the Mayor's plan was published in October (including forthcoming 7th January) you have not reviewed or discussed its 9 proposed actions for 2021-24, and whether they will be sufficient to deliver the scale of decarbonisation required by CERP. At the Combined Authority meeting on 9th December it agreed to prioritise 4 of those actions (TR01/05/06/09) which however do not seem likely to generate the emissions tonnage reductions to achieve the CERP pathways.
- It is now two years since the 'carbon impact assessment' of existing roads programme was commissioned in January 2020, and yet you still have not received a report on the outcome of that process, and how compatible its findings will be with the scale of transport decarbonisation. Having received those you would have then needed to act on them, to ensure that the forward transport investment programme is fully prioritised on the maximum amount of decarbonisation.
- Instead Transport Committee and the CA have proceeded via developing individual 'positive' decarbonisation measures in isolation, as if under the illusion that this incremental approach

¹ Source: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/996057/2005-19_UK_local_and_regional_CO2_emissions.xlsx full dataset tab, columns AC & AK, Bradford rows 858-872; Calderdale 873-887; Kirklees 933-947; Leeds 948-962; Wakefield 1143-1157 NB these figures exclude aviation.

² This includes the 4th September 2020 report *Carbon Reduction pathways and Connectivity plan update* paragraphs 2.5-13. The minutes however do record this single but still oblique comment: 'The significant discrepancy between the current situation and the targets would require significant policy shifts'.

would somehow produce the tonnage of decarbonisation needed, despite the fact that there is no evidential basis for that assumption.

- You have not undertaken an expert and independent review of the consequences of aviation demand and capacity expansion, which we maintain are wholly negative. Indeed in March 2020 you provided a platform for the LBA chief executive to present an unchallenged but fictitious account of how airport expansion and decarbonisation *are* compatible.
- Despite our urgings, your counterpart Transport Scrutiny committee has failed to include a review of the effectiveness of the overarching WYCA transport decarbonising process in its 2021-22 work programme.

In consequence, at the moment the WYCA Transport Committee has **no quantified and adopted analysis** of the scale of the huge transport decarbonisation problem we are confronting; **no analysis either of what decarbonisation scenarios** in detail might possibly be an effective response to it; and **no plausible delivery and investment strategy of equivalent magnitude**. It is for this reason that, in our audit of the Mayor's climate plan, we urged her and the WYCA Climate, Energy and Environment Committee to 'ensure that the Transport Committee considers within the next 3 months' - that is, by April - 'what its policies and programmes approach will have to be in order to achieve the emissions reductions of the various CERP scenarios'.

This open letter is entitled 'West Yorkshire's future transport decarbonisation FAILURE'. We believe you **must act now** - at your meetings on 7th January, 4th March and 29th April - in order to avert that potential failure; and to finally take 'ownership' of this critical issue in order to provide confidence to people across West Yorkshire that you have acknowledged the perilous circumstances with which, as a result, our 'climate emergency' is now confronted.

Yours - Anthony Rae

on behalf of the West Yorkshire network of climate and social justice organisations

c.c Mayor Tracy Brabin, WY climate 'lead' Cllr Tim Swift

Appended: audit of the West Yorkshire Mayor's Climate and Environment Plan; and reply to Mayor Tracy Brabin concerning the impact of road projects in combatting climate change, and Leeds Bradford Airport expansion

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The West Yorkshire Mayor's Climate and Environment Plan: An Audit by WY climate and social justice organisations

This **audit of Mayor Brabin's Plan** - prepared by the WY Friends of the Earth local groups and many other affiliated climate and social justice organisations - identifies some key issues for the Combined Authority and each of the West Yorkshire councils to consider as they reflect on progress they have achieved since 2019's Climate Emergency declarations and what they now intend to do to deliver the commitments of the Mayor's Plan. Our questions and suggestions are **highlighted in grey**; the most challenging of these concern **transport** which are on page 5

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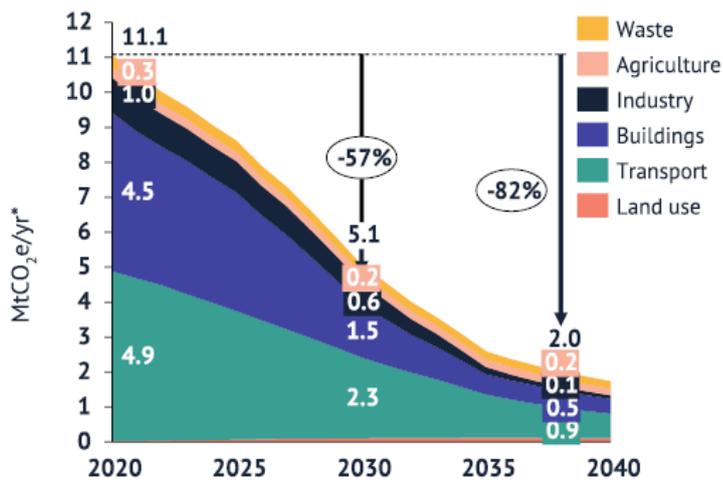
Between January-June 2019 the five West Yorkshire councils - Bradford, Calderdale, Kirklees, Leeds and Wakefield - and the West Yorkshire Combined Authority (WYCA) declared a 'climate emergency' - indicating a determination to act with increased urgency to reduce the region's carbon emissions to Net Zero by 2038 (2030 for Leeds). In July 2020 the Combined Authority issued its 'Carbon Emissions Reduction Pathways' study (CERP), which quantified a possible reduction in WY emissions from 11.1m tonnes annually in 2020 to 5.1m tonnes in 2030, a reduction of 57% in just 10 years - and proposed how, in detail, that scale of carbon reductions *might* be achieved. In May 2021 Metro Mayor Tracy Brabin was elected, with one of her 10 pledges being to 'tackle the climate emergency and protect our environment'. Now (October

2021) the Mayor has published her **Climate and Environment Plan**, with some 40 detailed policies and actions to be delivered by 2024.

But, with the third anniversary of those climate emergency declarations about to be reached from the start of 2022, we all need to ask **what has actually been achieved as the climate clock has ticked down through those 3 years, and will the Mayor's Plan now accelerate actions across the 2020s in order to achieve its target of Net Zero?**

The principal sections of the Plan concern:

● **Pathways and Scenarios:** it repeats the 3 emission scenarios of the CERP – 'Maximum Ambition', 'High Hydrogen', and 'Balanced Pathway'; together with a baseline scenario - which are expressed in pathways displaying how each of 6 emissions segments must reduce downwards annually. Below is the 'Maximum Ambition' pathway and shows that, as with all the other scenarios, the 2 largest segments having to reduce are buildings (power & heating), and transport.



● **Roadmaps and Action Plans:** there are action plans for eight areas, each with a number of policies - transport (9 policies), sustainable homes (2), business & industry (4), energy generation (4), natural environment (5), leadership (5), 'cross-cutting' (7), and 'climate ready' (3). Six 'roadmaps' illustrate visually how the major measures proposed for the pathway segments will be sequenced through to 2038.

● **Roles of the Mayor/public authorities/business/WY people:** the Plan's final section sets out what the Mayor and WY councils **will** do, the government **must** do, and businesses and people **could** do in order to implement its actions. This audit is intending to make a constructive contribution to the 'conversation' about the Climate and Environment Plan that Mayor Tracy Brabin has called for. It identifies just a small number of important areas where we suggest improvements should be considered.

### **The need for greater certainty and urgency**

We welcome the publication of the Mayor's Plan, but note that this was 27 months after the Combined Authority's declaration of climate emergency in June 2019, and 15 months after the availability of the CERP study. We ask: **how will it be possible to tackle the climate crisis and achieve the enormous scale of annual emissions reductions required in the 2020s if WYCA and individual WY councils take this long just to prepare its first Action Plan?**

So certainty of emissions reduction must be increased, but the problem with the Plan at the moment is that it:

- has not yet selected a preferred emissions pathway which the Mayor and West Yorkshire public authorities have to work to and deliver.
- has not identified anywhere the quantified amounts of emissions reduction tonnages that any of its proposed 40 actions have to achieve to be judged a success.
- has not set detailed timescales within its 2021-24 life by which the proposed individual actions must be advanced, or an intention to establish those timescales as its 'next step'.

Without these three essential features it will not be possible for the Plan to be implemented across partnerships which may have multiple members, nor can there be effective accountability and scrutiny by the Combined Authority mechanisms, and civil society. We understand why, immediately, a 'preferred scenario' has not yet been selected, and that instead *'The Action Plan is focused on the 'no-regrets' activity that will be taken over the next three years'* which will contribute to **all** scenarios. In itself this is a reasonable approach, but it can't be pursued at the cost of providing no quantified targets and timescales for the Plan's actions. The CERP is replete with quantified reduction proposals for each emissions sector which can be utilised. Please note also that we are not overlooking the fact that none of the CERP scenarios actually result in 100% NZ decarbonisation by 2038 - the best achievement is the 82% reduction of the 'Maximum Ambition' scenario - which we could claim is a critical shortfall. That may be the case but in this audit we wish first of all to rectify issues for the immediate future.

Consequently we **suggest to the Mayor and the WYCA Climate, Energy and Environment committee** that

- a delivery programme is immediately prepared which sets out the process by which the choices between pathways (which, as we'll see below, have crucial consequences in relation to transport emissions), nominal tonnage targets for individual action areas, and year-by-year (2021-24), timelines and milestones will all be provided.

- In relation to the monitoring of emissions reduction progress - where we welcome the decision of the Combined Authority on 9th December<sup>3</sup> to prioritise this action so as *'to ensure we are on track to meet the targets that we have set and to accelerate action where progress is off-track'* - we suggest that it should consider dividing each of those 3 years into two halves, and establish and communicate overarching 'what's going to happen in the next 6 months' timelines so that decision-makers and the general public can maintain an adequate awareness of how the Plan is meant to be advancing. Everyone across WY must have a means of knowing what is meant to be happening 'in the next few months' to tackle our Climate Emergency.

- Effective public communications about the Plan - that it exists, what its proposed actions are, whether they are being implemented or not - are a prerequisite. (Consequently we welcome the prioritisation of this action by the CA: *'Deliver communications and engagement with a focus on how partners, businesses and residents of West Yorkshire can work together to benefit from tackling the climate emergency'*.) For 15 months our groups were waiting to participate in the public consultation around the CERP promised by the authority in July 2020; this did not take place and there was no public information as to why not. The Mayor has promised a 'Conversation' about the Plan, but the [registration opportunity](#) for this has not been properly publicised. At the moment information about the Plan are semi-hidden under the 'Economy' tab on its website; surely it requires a tab of its own? The communications approach about the Mayor's response to our climate emergency must be improved.

### ***The Plan's individual action areas***

We believe **the action plans for individual emissions sectors are generally well structured, and with the necessary broad coverage, so creating a good foundation for the first 3 years of a West Yorkshire-wide plan.** This applies to 'business and industry', 'energy generation, supply and flexibility', 'natural environment', and 'climate ready'. For example action *NE02 Land-use Data and Evidence* (in Natural Environment) commissions the *'undertaking of research with partners on the current peatland condition in the region and potential for restoration'* which can then contribute to *'providing opportunities to 'slow the flow' of water through natural flood management techniques to provide more protection downstream'* in action *CR03 Flood risk and damage* (under Climate Ready). We have however more detailed comments (below) on two particular action plans: Sustainable Homes, and Transport.

There are three sections of the plan dealing with various aspects of coordination - 'Leadership', 'Cross-cutting', and 'Roles' - the effectiveness of which will be crucial for developing action at pace and (in some cases) from a standing start. The latter notes that *'We cannot [achieve Net Zero by 2038] alone and we will need the power of our partnerships and the people of West Yorkshire to do this together'* but, as will be well known, it's the alignment between the policies and actions of the UK government and what we do here in West Yorkshire that will be **the**

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<sup>3</sup> report *COP26 and the West Yorkshire Climate & Environment Plan* para.2.10.

determining factor. There are no fewer than 16 requirements listed on page 49 that the government *must* undertake – including *'provide new powers and multi-year sustainable funding and incentives for achieving net zero and nature recovery at regional and local levels - without these freedoms and flexibilities local areas will find it increasingly difficult to deliver against their locally defined targets'*. Consequently it's disappointing that the Combined Authority on 9th December did not identify this area as one requiring prioritisation. Maybe it's assumed that such interactions with government will take place in any case, but experience over recent years has not demonstrated that this engagement has been carried out forcefully enough or with success. It's suggested that the Mayor and Combined Authority must prioritise this *'advocacy to central government'* action, and publicly communicate what has been done, and with what results.

A parallel section of the 'Roles' area set outs the actions that the 5 West Yorkshire councils will undertake. These include *'produce and extend climate and environment roadmaps and action plans following climate and ecological emergency declarations'* and *'align Local Plan policies to further sustainable development, decarbonisation, net zero and nature recovery plans and outcomes'*. This is obviously important seeing that each council will have been developing its own approach to tackling climate emergency in the 3 years since 2019. But: are those district climate strategies effective; and do they integrate and reinforce each other, or not? It's critical that, at the start of implementing the Mayor's plan, that the extent of this alignment is quickly established. It's suggested that each WY authority should be requested to undertake an audit of the alignment between its own climate strategy and the Mayor's Plan - also identifying specific areas where synergies might be developed - for submission to the Climate, Energy and Environment committee and to the Mayor. To be able to undertake this, the *'tonnage targets'* and *'milestones'* suggested on the previous page will be essential. Scoping/demonstrating the alignment of the plan with the likes of the Y&H Climate Commission work and the Transport for the North decarbonisation strategy will also be important.

This will particularly apply to the interaction between *'climate emergency'* and spatial planning. We are already very aware of the contribution, **either positive or negative**, that the local plans of the five West Yorkshire councils can make to tackling the climate emergency. Local plans, whether already adopted or being prepared or revised, can in so many ways reinforce the thrust of decarbonisation or alternatively comprehensively undermine it, not just now but over the crucial next decade.

In theory the national planning policy framework has set the right framework – *'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions ...'* para.148 - but without the strongest possible coordination inside authorities then this doesn't necessarily happen. We appreciate that the Mayor has not been allocated a responsibility for spatial planning, which is a major setback - but nonetheless it is good to see that action CC02 Strategic Planning - *'We will develop the spatial evidence base to tackle the climate and environment emergency and use this to inform and influence Local Plan policy and a potential West Yorkshire Strategic Spatial Plan'* - has been included. We understand that a report is being prepared to review *'issues and options'*. We suggest that, once this report has been considered, the Mayor - and then each of the West Yorkshire authorities - should initiate the process by which civil society and other parties can submit their own contributions about how the interaction between climate emergency and spatial planning strategies and local plans can be made to reinforce each other.

**Sustainable Homes** - This section of the plan notes the sheer scale of the housing energy efficiency problem: *'just less than 700,000 existing homes across West Yorkshire will need some form of energy efficiency retrofit to be undertaken to bring them up to a level that contributes to significant emissions reductions'*, and then additionally, there's the task to ensure that *'the energy efficiency and low carbon heating and power of the thousands of new homes to be constructed in the region is built into their design at the construction stage'* so that these do not contribute to further emissions and require expensive retrofits in the future.

The two measures proposed in the Plan are the establishment of a home energy advice service, and a *'Better Homes Yorkshire Hub'* which appears to be the location of all the many diverse routes to more energy efficient and warmer homes, including *'making the case, and submitting proposals, to government for sustainable long-term funding for West Yorkshire'*, *'requiring that the performance of new build homes meet energy, water efficiency, climate resilience and and*

*space standards', and 'procuring a framework of high-quality repair, refurbishment and retrofit suppliers', as well as 'supporting the building of 5,000 affordable and sustainable homes'.*

Since so much is riding on the performance of the Better Homes Hub we ask the following questions: When will the Hub be up and running?; who will be running it?; when will it publish its own detailed action plan for the 10 areas it's responsible for?; how does WYCA intend to engage with the proposals of the government's new Heat & Buildings strategy?; and which WYCA committee is responsible for supervising the delivery of the Hub?

But it's the Plan's section on **Transport** - around which our environmental groups have already been campaigning for years - which represents the biggest challenge, for a number of reasons. At the national level, total transport emissions (so including aviation) have risen both absolutely and relatively since 1990: from 152Mt to 165Mt in pre-Covid 2019 - so haven't even begun the process of decarbonisation - whilst increasing their share of the national carbon budget from 17% to 33%. In West Yorkshire, the government's local authority level statistics (which do not however include aviation) show that transport emissions of 4.5Mt in 2005 have dropped only marginally to 4.3Mt in 2019, and with actual increases since 2013. The transport share of all WY local emissions has consequently soared from 28% to 40%. These trends are replicated in all 5 West Yorkshire districts.

The failure of transport decarbonisation policy at the national level (which is the responsibility of the Department for Transport) therefore creates a daunting backdrop for the scale of WY emissions reductions required by 2030: from a 2020 baseline of 4.9Mt in the CERP scenarios (which properly include aviation) to 4.1Mt by 2030 in its Baseline scenario (-16%), 3.0Mt in its Balanced Pathway and High Hydrogen scenarios (-39%), and 2.3Mt under 'Maximum Ambition' (-53%). The latter would require annual emissions reduction averaging a quarter of 1m tonnes every year! If transport emissions only achieved Baseline pathway reductions to 2030, **they would by then take up 80% of the total West Yorkshire carbon budget.**

This review of the transport tonnage data therefore sets the context for an assessment of the Mayor's 9 proposed actions TR01-9<sup>4</sup>, and establishes two fundamental tests which they have to pass. The Actions have a common characteristic: they all propose 'positive' measures to improve the carbon efficiency of particular transport modes or services, and the take-up of more sustainable modes. But on their own, this cannot be an adequate response to a transport decarbonisation challenge of this scale. Instead we have to ask:

- Does the Plan propose actions which will prevent a continuation of the two 'negative' trends - increased road vehicle demand and capacity, and increased aviation demand and airport capacity - that have been driving transport emissions upwards?; and the answer is **No**
- Will the Plan's 9 positive actions produce sufficient emissions reductions to achieve any of the reductions scenarios, and the answer is **we don't know** because there is no evidence or data that demonstrates that in aggregate they will achieve the necessary decarbonisation tonnage. In consequence, and until an analysis of the transport decarbonisation strategy shows to the contrary, the **environmental groups are assuming that transport emissions will only achieve a Baseline pathway reduction to 2030**, with the consequential catastrophic impact on the WY carbon budget and on the Mayor's Plans to reduce it.

This is therefore also a governance crisis. The WYCA Transport Committee has to our knowledge not been presented with an overarching quantified analysis of the **scale** of its decarbonisation challenge, and so have not engaged with it. Instead they have proceeded by considering and improving individual 'positive' measures (of the same type as TR01-9) in isolation, as if under the illusion that this incremental approach would somehow produce the necessary amount of decarbonisation despite the fact that they had no basis for that assumption.

Moreover the Combined Authority on 9th December agreed that the transport decarbonisation 'first priorities for the next three years' should be actions TR01/05/06/09, a selection which does not seem likely to maximise emissions tonnage reductions such that the CERP pathways can be achieved. Specifically the action within TR02 - to '*scrutinise the case for the construction of new roads through the funding that we control and only move schemes forward where they*

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<sup>4</sup> We have also considered the Mayor's response of 2nd December to an Action Network petition calling for WYCA not to proceed with road capacity expansion, and to oppose LBA expansion. Our reply to that letter is being submitted at the same time as this Audit, and contains more detailed information on these issues.

*demonstrate significant benefit in delivering our priorities* - has **not** been prioritised. We've also noted that the newly established Transport Scrutiny Committee has not, as we urged, included in its work programme for the 2021-22 year consideration of 'the extent to which the 9 actions of the Mayor's plan will be sufficient in themselves to achieve the amount of decarbonisation identified by the WYCA carbon emissions reduction pathways study', or to 'test the integrity of WYCA 'carbon impact assessment' of its major roads programme'.

Collectively these initial decisions do not bode at all well for starting the successful decarbonisation of this the largest and most intractable emissions sector, thus justifying our judgement above that only Baseline reductions may be delivered.

Therefore we call upon the Mayor and the WYCA Climate, Energy and Environment committee to:

- take immediate action **to ensure that the Transport Committee considers within the next 3 months what its policies and programmes approach will have to be in order to achieve the emissions reductions of the various CERP scenarios.** This becomes even more important due to the decision of the CA in December to prioritise four action areas without first quantifying their carbon reduction potential. Successful transport decarbonisation is essential for all aspects of the plan, and WY civil society has to know that the Transport Committee and the Combined Authority itself have finally accepted 'ownership' of the scale of this huge problem.
- produce a **quantified and sequenced analysis of the Plan's 9 positive measures** that can demonstrate what emissions tonnage reductions will be produced by each of them, and year by year to 2030, so that their collective contribution can be tested against the CERP scenarios.
- When (as we understand) the Climate Committee finally comes in January to consider the results of the Carbon Impact Assessment process to be applied particularly to the major legacy programme road capacity improvements which the Mayor has inherited, it must i) **make available to interested parties all the Assessment's underlying data and modelling assumptions** so that they can be subject to independent scrutiny; and ii) not just **apply its carbon assessment** to individual infrastructure schemes, but **to the road capacity programme as a whole**, and the **ability of this major area of transport capital funding to be contributing to priority decarbonisation investment.**
- Since, as we have already pointed out to WYCA Climate committee, the Plan's proposed response to Leeds Bradford Airport expansion - 'produce a national decarbonisation strategy for aviation and introduce a frequent flyer levy' *page 50* - has already effectively been rejected by the government, which still has the ability to immediately approve the LBA planning application, **the Mayor and Combined Authority must now go further and publicly call on the government to reject the application.**

We hope you've found this audit of the Climate & Environment Plan constructive (if challenging!) We look forward to continuing a discussion about this during the first half of 2022.

20th December 2021  
ar@anthonyrae.com

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20th December 2021

Dear Mayor Tracy Brabin

### **Impact of road projects in combatting climate change, and Leeds Bradford Airport expansion**

Thank you very much for your reply of 2nd December to the petition submitted to you via the Action Network on these issues. In view of their importance to the West Yorkshire's climate emergency and to your recently published Climate & Environment Plan (CEP), we've prepared the following response so as to continue the 'conversation' you've asked for about the Plan. This is linked to the Audit of the CEP which we're also submitting to you today, and which we hope to

be discussing with you and West Yorkshire councillors as part of the WYCA January cycle and beyond.

### **Carbon Impact Assessment of road schemes**

As you say there are complexities involved in assessing the carbon impacts of road schemes, but with the majority of the existing Transport Fund being allocated to such programmes, and with West Yorkshire transport carbon emissions as a share of total local authority emissions having now risen from 28% to 40% between 2005-90<sup>5</sup>, it was vitally important that the Combined Authority and West Yorkshire councils should have been evidencing from the start whether or not these schemes would be undermining their own climate emergency declarations. For more than 5 years, as these schemes have been inserted into local plans, campaigners across West Yorkshire have sought information, at both scheme and WY-wide level, about two key outputs:

- *How much additional traffic would be generated by this expansion in road capacity?* (something important not just for carbon, but related issues like air quality, and also community amenity, severance and safety. Reducing road 'congestion' costs would also tilt the balance further against public/active transport).

- *How much additional carbon emissions would be generated by this expansion in road traffic?*

We have never been able to get answers to these questions. Following the commissioning of the carbon impact assessment (CIA) in January 2020 our groups have persistently asked that WYCA make public the results of this process; for example it was the subject of our deputation to the Transport Committee chair in December 2020. By the time the CIA is reported (as we understand) to the January 2022 cycle the Combined Authority has been 'flying blind' for years with regard to the carbon consequences of its roads programme as it has continued not just to develop but proceed to actual scheme implementation.

Over the two year period whilst the CIA has been in preparation the policy context for road capacity expansion has been changing. Taken together those developments (see footnote<sup>6</sup>) seem to create a national context in which the **volume of traffic is likely to increase**. However at the same time, the WY Carbon Emissions Reduction Pathways (CERP) study is saying that **the opposite must happen in West Yorkshire** because vehicle electrification on its own will not result in sufficient decarbonisation - 'Private car use must decline by between 21-38%' - something confirmed both by Prof Jillian Anable of Leeds ITS and other studies.<sup>7</sup> Now your Climate & Environment Plan is committing to 'examine the evidence and blend of policy options required to **reduce car trips** and encourage a mode shift to public transport and active travel *TR03 our emphasis* (in addition to implementing the CIA process via *TR02*<sup>8</sup>) But then, as a preliminary view of the CIA's findings, your letter states that 'Other schemes aimed at improving general traffic **can also result in carbon reductions** by reducing congestion' *our emphasis*, implying that increased capacity is compatible with at least some amount of decarbonisation.

In addition to these policy complexities which will have to be unravelled and balanced, there are also a parallel set of modelling complexities we will want to understand - in order to scrutinise

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<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/996057/2005-19\\_UK\\_local\\_and\\_regional\\_CO2\\_emissions.xlsx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/996057/2005-19_UK_local_and_regional_CO2_emissions.xlsx) full dataset tab, columns AC and AK, Bradford rows 858-872; Calderdale 873-887; Kirklees 933-947; Leeds 948-962; Wakefield 1143-1157 - analysis by environmental groups.

<sup>6</sup> **November 2020**: government agrees to end the sale of most fossil fuel cars in 2030, resulting in a reducing share of such vehicles in the fleet profile across the 2020s. **December 2020**: the CCC 6th carbon budget report demonstrates that vehicle electrification will reduce the cost of car travel (purchase, maintenance and journeys) resulting in increased journeys [CCC Surface Transport sector summary figure A3.1.g, page 55]. **July 2021**: DfT Transport Decarbonisation Plan signals that the government does not intend to apply a constraint to overall road traffic (forecast to increase by 51% 2015-50 *Union Connectivity Review page 15*), but might consider a stabilisation/reduction in *urban* traffic (which is what most of the WY schemes will involve); **October 2021**: Treasury NZ review does not signal that they are preparing to contemplate road user charging as a substitute to declining fuel duty resulting in a gradual erosion of fiscal constraint.

<sup>7</sup> Green Alliance [Not going the extra mile](#) December 2021

<sup>8</sup> 'Scrutinising the case for the construction of new roads [*we assume this means 'new road capacity'*] through the funding that we control and only move schemes forward where they demonstrate significant benefit in delivering our priorities'

the integrity of the CIA process<sup>9</sup> - such as how changes to the following have been dealt with:

- i) the composition of the vehicle fleet, as over an extended time period it is increasingly electrified;
- ii) another composition analysis relating to how trips are reallocating between motor vehicles and public/active transport;
- iii) the volume of traffic flows down a road corridor, which could be expected to increase if the capacity is enlarged (thus 'reducing congestion') but with the latter benefit eroding over time as additional traffic is induced; and
- iv) the average speed at which vehicles are travelling, plus consistent flow, which will impact the quantity of different emissions in individual ways.

Other related components we would wish to examine would be how the CIA has dealt with particulate emissions (and the link of those to health expenditures), and the extent of potential traffic diversion from 'improved' corridors to the whole road network. Finally we will also want to be clear as to whether it is the intention of the Combined Authority to apply the CIA findings (just) on a scheme-by- scheme basis, or whether it will be presenting an assessment of changes to overall traffic volumes and carbon emissions across the West Yorkshire network as a whole.

In view of all these complexities can we make the following comments in advance of the CIA report

- That either the above issues are adequately dealt with in the report, or alternatively that there is a subsequent process by which we can discuss them in detail with WYCA officers.
- Whatever the ultimate balancing of the policy and modelling complexities, the report must clearly state **whether the assessed carbon impacts from these schemes are sufficiently large so as to make the necessary contribution to the scale of emissions reductions the CERP study requires by 2030** - up to 53% in the Maximum Ambition scenario<sup>10</sup>;
- Relatedly, it must also adequately provide its answer to this question: 'If the volume of West Yorkshire traffic must substantially reduce, what is the purpose of increased road capacity?'

## **Aviation**

In relation to your response about Leeds Bradford airport and aviation expansion, things are a little less complex. Overall we have to question who is providing you with the necessary expert advice on this issue which - apart from the many examples referred to below - does not appear to encompass what the Combined Authority's own CERP study says about the need to reduce aviation passenger demand and emissions.<sup>11</sup> Your reply also echoes that provided by Leeds City Council in trying to justify its decision to grant planning permission.

First of all the basic facts. UK aviation emissions in (pre-Covid) 2019 were **85% above the 1990 baseline** set by the Climate Change Act (39MtCO<sub>2</sub>e compared to 21Mt). Since you mention 'net zero aviation emissions by 2050', in that year aviation emissions will **still be above that baseline** (23Mt according to the Climate Change Committee). So no decarbonisation whatsoever across the entire 1990-2050 period. In fact just the opposite: the LBA application proposes to increase the airport's emissions by **+41% by just 2030**, and thereafter continue to erode West Yorkshire's cumulative carbon budget.<sup>12</sup> By 2050 the CCC national modelling shows that this approach will require '40% of total UK engineered greenhouse gas removals to be assigned to the aviation sector to achieve NZ within aviation', at the expense of every other economic and social sector, including here in West Yorkshire.

This is the context in which we read your statement that you 'do not support unconstrained

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<sup>9</sup> Whilst as you say components of a CIA analysis maybe 'published as scheme summary business cases, and can be found on our website', we've found that those business cases are insufficiently granular and emerge into public view too late in the process.

<sup>10</sup> From a 2020 baseline of 4.9Mt, the CERP scenarios reduce to 4.1Mt by 2030 in its Baseline scenario (-16%), 3.0Mt in its Balanced Pathway and High Hydrogen scenarios (-39%), and 2.3Mt under 'Maximum Ambition' (-53%).

<sup>11</sup> CERP: emissions - top right hand box pages 26, 31, 36; passenger demand bottom RH box pages 27, 32.

<sup>12</sup> LBA application, Environmental Statement chapter 7, figures 7-5/7 Annual emissions in 2030: 349,000 tonnes Without development 491,000 tonnes With development

growth', when that is precisely what LBA is proposing! It is disappointing to see you repeating the discredited approach that a single airport represents only a small proportion of a much larger total ('LBA constitutes about 1.4% of total UK aviation, so is a small part of the national challenge') which is the rationale deployed by airport operators as a justification for huge emissions expansion. We believe this amounts to supporting the position of the aviation sector that somehow they are entitled to a privileged supershare of the UK and West Yorkshire's rapidly diminishing carbon emissions, which they want to erode at an even faster pace by expansion in the 2020s.

You maintain that this is something to do with 'ensuring our economy remains competitive' when you must know that around 80% of flights are discretionary leisure, with a similar high proportion being taken by a small percentage of wealthy people. Taking the position that constraint at LBA 'will simply mean passengers use other airports' means that you are endorsing the 'race to the bottom' which so many other individual airports proposing expansion are deploying right at this moment. So rather than constraint 'reducing our competitiveness compared to other regions', isn't it actually protecting the West Yorkshire economy, present and future, against the consequences of an emissions surge by a single rogue sector catering particularly for a wealthy minority?

Suggesting that constraining aviation expansion principally 'requires a national and international approach' ignores the policy levers available at the local level e.g the LBA planning application could have been legitimately rejected on climate grounds alone. WYCA officers have also failed to apply government policy that requires that airport operators must meet the cost of consequential surface access schemes as a result of capacity expansion.<sup>13</sup> As for the DfT's Jet Zero Consultation your advisers apparently do not know that this explicitly rejected demand constraint as a policy lever to achieve lower emissions (all 4 scenarios involved demand expansion of 58-60% by 2050) at the same time as the Transport Decarbonisation Plan has maintained support for continuing capacity expansion at every regional airport. Instead the DfT consultation relies solely on the deployment of future technological advances concerning 'sustainable aviation fuels' and electric planes, which it itself repeatedly notes are uncertain. The government has also explicitly rejected the frequent flyer levy which you reference in your Climate Plan *page 50*. So when you say 'we are considering the implications of this [consultation] for West Yorkshire' it only seems to reveal how out of touch the public authorities in Leeds are with national aviation policy.

The position of the UK government is **already to reject** aviation demand and capacity constraint - which involves setting aside the advice of the Climate Change Committee - and emissions reduction below the Climate Change Act's 1990 baseline. You as Mayor can no longer 'sit on the fence' as if that position is amenable to discussion or influence. If you continue to do so you would be seriously undermining your own Climate Plan. Consequently we submit that you and the Combined Authority must now **publicly call on the government to reject the LBA application**.

Yours - Anthony Rae

*on behalf of the WY network of climate & social justice organisations*

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<sup>13</sup> DfT *Aviation Policy Framework* 2013 paragraph 5.12