

ANALYSIS REPORT MAY 2024

Will **Labour** FAIL its transport decarbonisation test?

*& Why that matters for
the UK climate crisis*



In 2008 the last Labour government enacted the Climate Change Act, which should have initiated a process of incremental annual carbon reductions in every emissions sector. But for the period of Conservative governments since 2010, up until the 2020 Covid pandemic, Transport emissions not only did not reduce at all below the Act's 1990 baseline. Their expansion was actually promoted by deliberate policies applying to both Roads and Aviation. Consequently the entire first half of the 60 year period to Net Zero in 2050 has been lost, with transport now by far the largest emissions sector.

This is the situation Labour will inherit in government should it win the next General Election. The scale of the UK's transport emissions problem is huge. So far Labour has recognised that 'to deliver Net Zero it is essential to decarbonise transport'. But, beyond that initial declaration, how exactly does Labour intend to tackle this task of unprecedented difficulty, as the clock ticks relentlessly down? Surely preparations for that need to be made in advance of the 2024 General Election? So ...

Will Labour PASS or FAIL its 'transport decarbonisation test'?

The reason the question is asked is that so far Labour itself has NOT disclosed the answer.

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This detailed Analysis Report accompanies the short Issues Briefing which summarises its conclusions. [Download here.](#)

Executive Summary

Note: Because the transport decarbonisation narrative will continue to evolve up to the General Election a revised edition of this report will be available to download at the end of each month, alongside update articles on the [Transport North](#) website. The accompanying short Issues Briefing can be downloaded [here](#).

1. The availability of sustainable and affordable transport is important for every aspect of our society and economy: for businesses, communities and individuals. But transport is also the **UK's largest carbon dioxide emissions sector** which, in the decade before Covid and across the entire first half of the 60 year Net Zero period between 1990-2050, has shown **no reductions** at all. If Labour is elected to government in 2024 it will, with now just 25 years remaining, have to institute a decisive change in the direction of the transport decarbonisation pathway. This report explores the multiple reasons why that **cannot be accomplished within the existing policy frameworks** for the two transport modes responsible for most carbon emissions: **roads (66% of annual transport emissions) and aviation (23%)**; so 89% of the total.

2. Developing and implementing policies to secure a transport decarbonisation pathway will contribute to the legal requirement to achieve Net Zero by 2050 established by the Climate Change Act 2008. The statutory plan required under S.13 of the Act was firstly the Net Zero Strategy (October 2021) and then the Carbon Budget Delivery Plan of March 2023. However **both have been overturned in the courts**. At the moment (May 2024) Labour has a commanding lead in the opinion polls, which has stayed solid over the last 18 months. If that lead was to be maintained up to the 2024 General Election the future implementation of transport decarbonisation would fall to Labour to undertake, with this emissions sector central to the responsibility of the next government to formulate a new and lawful UK Net Zero Strategy by May 2025.

3. To assess and assist Labour's preparedness to undertake the exacting task of organising and delivering transport decarbonisation this report has drawn up a list of questions - in fact there are 55! Each question about a particular decarbonisation topic provides background information, policy analysis and sources. In particular they ask about Climate Risk: Is climate risk over the next 5 years likely to reduce, or alternatively increase, because of action to be taken by Labour; and the Contribution of Policy Frameworks: Is the contribution of those underlying frameworks either to constrain or potentially to accelerate the rate of transport decarbonisation. Together, awareness of and having policy responses to these **55 Questions constitute a 'transport decarbonisation test'**. The purpose of the report is to assist Labour policy and decision makers in understanding whether before government they are able or intend to pass that test by successfully delivering transport decarbonisation when in government.

4. **Scale of the future decarbonisation task**: In 1990, the baseline set by the Climate Change Act, total transport emissions were **152.9 MtCO₂e**. By pre-Covid 2019 they had **increased** to **169.7MtCO₂e** or **+11% above** the baseline. As a consequence transport emissions had increased their share of the UK carbon budget between 1990-2019 from **18.3%** to **34.5%**, close to doubling. Thus in the first half of the Net Zero period 1990-2050, **transport emissions have not reduced at all**, requiring that complete decarbonisation to Net Zero will now have to be achieved in just half the time.

5. This situation has occurred because of the failure of the Department for Transport (DfT) over the last 2 decades to progressively reduce transport emissions; instead roads and aviation demand and capacity have been promoted upwards as a matter of policy. In December 2020 the Climate Change Committee established a transport decarbonisation pathway that requires a reduction from

167MtCO₂e in 2019 to **118MtCO₂e** by 2030; a reduction of **49MtCO₂e** or -30%, a milestone now just 6 years away. However the 2030 target was an aggregate of two quite different pathways: requiring radical reductions in road emissions made possible by the transition to electric vehicles from 2030/35, but almost no reductions whatsoever in aviation (and shipping) emissions.

6. Moreover in the decade before 2019 transport emissions had reduced by just **3MtCO₂e** (from 170.2MtCO₂e to 167.2 MtCO₂e) meaning that there is little established downward momentum and practice available to be accelerated. That pattern is also replicated at regional and local levels. This circumstance has come about because of the mostly unnoticed impact of a small number of policy frameworks, for roads and aviation. Worse still, these **two dominant policy stances have now been inserted within the DfT's Transport Decarbonisation Plan** (TDP - 2021), the strategy which is meant to be driving downwards the carbon emissions that those two modes have inflated.

7. **Roads:** 2019 road emissions at **111.4MtCO₂e** were still level with the 1990 baseline (+0.5% above) but are projected to **reduce to 66MtCO₂e in 2030 (so 41% below 1990)** and just 31.5MtCO₂e in 2035 (72% below 1990). They then drop to single figures by the 2040s. But whilst the transition to EVs will have begun to bend the roads emissions pathway downwards, this will not be enough. That reduction will be eroded by the upward pressure resulting from the continued influence of three existing roads policy frameworks - the national road traffic projections, the National Networks national policy statement, and the Road Investment Strategies. These underpin major annual programmes of new road construction that: induce more road traffic; undermine more sustainable modes; often represent poor value for money; and can't be challenged on climate grounds. The next government will need to revise these frameworks if road transport is to be made compatible with Net Zero, but at the moment Labour's intentions about roadbuilding are unknown. Reallocating capital expenditure away from new roads schemes provides a major opportunity to boost spending on other priorities.

8. **Aviation:** For two decades DfT policy has deliberately promoted the expansion of passenger demand and airport capacity regardless of the emissions consequences. As a result in **2019 emissions were +125% above** the 1990 baseline, and are projected to be **+108% above** in 2030, and still **+13.5% above** in 2050, consequently achieving **no decarbonisation at all** over the entire Net Zero period. The Climate Change Committee is now explicitly clear that continuing aviation expansion is incompatible with decarbonisation. However 2022's Jet Zero Strategy (JZS) policy framework is still incurring increased climate risk. It relies almost exclusively on technological interventions which cannot be effective in the next 10-15 years, whilst demand management interventions, which can act quickly against climate risk, have been deliberately excluded. Almost unnoticed, the JZS has removed all the regulatory levers by which passenger demand, airport capacity and therefore emissions can be managed. To become Net Zero compliant an incoming Labour government would have to radically revise the JZS policy framework. There are no indications this is being contemplated.

9. **Public & Active Transport:** At present Labour seems to be suggesting, for example in The *Clean Energy Superpower* briefing which takes forward its climate 'mission', that sufficient transport decarbonisation can be achieved mainly through improved public transport alone. Public transport modes represent a small proportion of UK travel so even if usage and occupancy rates exhibited radical improvements this would not be able to abstract sufficient carbon removals from the much larger road and aviation emissions sectors. It's likely that there will be limited availability of capital and revenue funding for expenditure commitments either already made by Labour or contracted by the Conservative government.

10. Implementation Approach: Transport decarbonisation is uniquely complicated because travel crosses planning and governance boundaries. So if action across all levels - from UK > devolved administrations > subnational transport bodies > combined authorities/counties > local councils - isn't coordinated within an implementation framework specifically designed to align strategies and programmes, then it's almost inevitable that the task of organising decarbonisation will falter or fail. The imperative for carbon reduction required the TDP process to quickly think through what might be a new 'wiring diagram' to deliver its targets. However the TDP was not accompanied by an implementation framework setting out when/how its delivery would be undertaken. Of its 78 'headline' commitments it's not known how many have been implemented and with what carbon impact. Local Transport Plan guidance meant to be focused on decarbonisation was first delayed for 2+ years, and has apparently now been cancelled.

11. Delivery Risk: Successful judicial reviews of the government Net Zero Strategy (NZS) and the successor Carbon Budget Delivery Plan (CBDP) - culminating in the recent 3rd May 2024 Net Zero II judgement - have established a requirement that the delivery risk attached to decarbonisation implementation must be assessed and acted on. Independent expert analysis has established that in the period up to the March 2023 Carbon Budget Delivery Plan, the policy ambition to achieve the required tonnage of roads decarbonisation diminished substantially. For aviation the Jet Zero Strategy deliberately promotes increased demand (52% by 2050) and consequently also delivery risk. The implications of the Net Zero II judgement are yet to be crystallised but are likely to involve a testing of the relationship between **the increased climate risk generated by transport policy** and the requirement for a next Labour government to produce a lawful NZS, and a determination of whether the current unlawful position of the CBDP **renders components of the new transport infrastructure process unworkable** until a revised Plan is found to be lawful after May 2025.

12. A limited number of Department for Transport (DfT) roads and aviation policy frameworks are incompatible with achieving Net Zero. At present they act as roadblocks against transport decarbonisation, but if amended could be its accelerator. They, along with related frameworks in other departments, will need to be revised urgently as essential early prerequisites for successfully implementing decarbonisation across the next Parliament.

National Road Traffic Projections: revised to now include scenarios compatible with accelerated decarbonisation.

National Networks national policy statement: limited revision to allow the assessment and independent challenge of properly quantified carbon impacts of new roads schemes.

Road Investment Strategy (and its Delivery Plan): revised to remove schemes not compliant with accelerated decarbonisation.

Jet Zero Strategy (and associated documents): will need to be withdrawn and radically revised because incompatible with accelerated decarbonisation.

Airports national policy statement: revised to align with an NZ-compatible policy framework.

Transport Decarbonisation Plan: revised to remove elements promoting roads & aviation expansion and to include an accelerated decarbonisation pathway with mechanisms to drive it forward and provide transparent monitoring.

National Planning Policy Framework (NPPF): targeted revision so that it does 'shape places in ways that contribute to radical carbon reductions'.

Regional & local implementation framework: This will need to be remade based around the mediating role (in England) of subnational transport bodies, upwards to DfT national decarbonisation strategies and downwards to city regions/counties/local authority implementation programmes.

These frameworks are not 'fit for purpose' and that it's difficult to believe that an incoming Labour

transport ministerial team could begin its work without first testing whether the DfT's principal policy frameworks affecting decarbonisation are indeed Net Zero compatible.

13. **Revising these policy frameworks is the best option for accelerated transport decarbonisation**

Recognising the likely constraints on public expenditure already signalled, reviewing and revising this limited number of little known transport policy frameworks would be the **least expensive**, the **least controversial**, the **most effective**, and the **most certain** way of getting and keeping the transport decarbonisation pathway on track. Revising them would be the quickest, lowest-cost way of boosting Labour's ability in government to quickly assemble its transport decarbonisation effort; it would open up the space for the implementation changes required to accelerate carbon reduction at every level and with multiple co-benefits; and allocate responsibility for developing and paying for decarbonisation actions correctly to the actors responsible for the pollution. On the other hand **if these frameworks are left in place they will continue to drive emissions in the wrong direction**, jeopardising the achievement of critical 2030 milestones and targets, and those beyond them.

"Reviewing and revising a limited number of little known transport policy frameworks, as this report recommends, would be the least expensive, the least controversial, the most effective, and the most certain way of getting and keeping Labour's transport decarbonisation pathway on track"

14. As a **'call to action'** - to put the analysis of this report into practice - it recommends conducting a two stage process: Stage 1 in the *pre*-election period and *before* government: **developing a comprehensive transport decarbonisation analysis** leading on to scenario development; and then Stage 2 in the *post* election period and when *in* government: the **construction of more detailed policy scenarios and intervention options** that would form the building blocks of mode by mode burden sharing towards a specified and quantified carbon reduction pathway, and finally programmes of interventions. The template for a **transport decarbonisation scenario** is described (appendix 1) which seeks to optimise criteria of minimised cost, public acceptance, equity, the 'polluter pays' principle, and the ability to accelerate carbon reduction. Such a decarbonisation scenario is likely to be broadly positive against key criteria.

15. The report **very deliberately does not propose particular solutions or interventions** to the multitude of problems it has assessed; not as a tactical manoeuvre in order to evade the public controversy and attacks from political opponents and their media allies that characterise this issue, but because it follows from essential methodology. It would be premature (within stage 1) to be identifying such interventions, or indeed back to front. The stage 1 thinking should instead **be fed into the 'access talks' with civil servants, to allow them to begin to think through what major policy options and scenarios in government might be**, and how those interact with other departmental areas, other emissions sectors, and the 5 Labour 'missions'. It should also be the subject of discussion involving various levels of Labour stakeholders: the shadow ministerial team, its national policymakers, its MPs (and PPCs), city region mayors (and their teams), county and local leaders

16. As at the time of publication (May 2024), and having completed this in-depth assessment, it seems that the **answer to the question *Will Labour fail its transport decarbonisation test?* is more likely to be Yes** rather than No, for all the detailed reasons described throughout the report. This is a very serious and disappointing judgement to have reached. Labour absolutely could pass its transport decarbonisation test if it adopted the 'call to action' being suggested. And it **must** do so, otherwise the UK's pathway to Net Zero will be put in peril. But preparations to achieve this have to start now. They can't wait until Labour ministers walk into Great Minster House on the first day of a new government.