

Paragraph 2.3.9 of the Overarching NPS (EN1) makes an unsubstantiated claim that ‘some limited residual use of unabated natural gas and crude oil may even be needed beyond 2050’, before admitting that no detailed assessment of this claim has been made, due to ‘policy uncertainties.’ It is unclear then what purpose this claim serves. The critical uncertainty with regard to any residual greenhouse gas emissions in 2050 is what quantity of negative emissions will be available to compensate for them – but any prudent assessment must err on the side of caution and assume a very limited availability of negative emissions, due to sustainability concerns of land-based negative emissions, and technological uncertainties around engineering approaches such as direct air capture. In this context, the priority sectors requiring offsets will be those which are extremely hard to mitigate – agriculture, aviation and waste.⁴ The concluding statement of Paragraph 2.3.9, that unabated natural gas and crude oil use ‘can be consistent with our net zero target if any emissions are balanced by negative emissions from GHG Removal technologies’ is potentially misleading, if it is not clarified that this does not apply to emissions from demands such as heating, cooking, electricity, surface transport and industry. It is unlikely that there will be sufficient available negative emissions to offset significant unabated emissions from these demands.

Recommendation: The NPSs should be revised to remove ambiguities and clarify that reaching net-zero will mean the near-total elimination of unabated fossil fuels from all but the very hardest to decarbonise demands, such as aviation. It should be ensured that the language emphasises not the prolongation of the fossil fuel era, but rather the rapidly closing window for new unabated fossil fuel investments, and the urgent need for fossil fuel infrastructure to undertake net-zero consistent transitions, in order to avoid obsolescence.

C2. Public support in the UK for onshore wind remains high (70% according to BEIS Public Attitudes Tracker⁵), and onshore wind is the cheapest generator of low carbon energy – its global weighted average cost is now lower than the lowest cost fossil fuel generators⁶. The exclusion of onshore wind from the category of nationally significant infrastructure project does not reflect broad public opinion or economic reality.

Recommendation: Onshore wind should be included in the NPSs.

Acknowledgments

This response has been prepared by Dr Nick Hughes of the UCL Institute for Sustainable Resources. I would be pleased to speak further about this response. Please contact nicholas.hughes@ucl.ac.uk.
