TO: [netzeroreview@beis.gov.uk](mailto:netzeroreview@beis.gov.uk)

From: Hazel and Steve Dawe, Cowley Area Transport Group – [www.catg.org.uk](http://www.catg.org.uk) – 53 Bulan Road Oxford OX3 7HU – 07747 036192

**The Net Zero Review, deadline 27/10**

“The review will consider how our approach to net zero can:

* deliver maximum economic growth and investment, driving opportunities for private investment, jobs, innovation, exports, and growth right across the UK
* support UK energy security and affordability for consumers and business and the need to rapidly increase and strengthen UK energy production and supply
* minimise costs borne by businesses and consumers, particularly in the short-term”

Comments: Unqualified economic growth is incompatible with Net Zero, offers no restrictions on abuse of the environment in the most nature-depleted country in the world, and no recognition of serious, long-term, global physical resource constraints -meaning a vigorous UK effort is required to do more with less. Conventional growth involves unrealistic unending consumption of finite resources: this is a ludicrous fantasy and needs consigning to past history if Net Zero and future sustainable development is going to be credible. For example, councils should have the resources to buy existing homes on sale for council and keyworker shared-ownership housing and for sustainable retrofitting; in addition, councils need to be able to exercise compulsory purchase on: neglected private rental properties,[[1]](#footnote-1) empty and second homes, long term empty office and industrial buildings capable of conversion to homes; homes can also be built around, above or right over surface car parks whether in public or private sector, instead of the short-termist idiocy of greenfield site building.

We need to address as priorities the Climate Emergency, the various ecological emergencies and grotesque inequality in the UK. Considered pursuit of Net Zero can deal with all of these matters.

The contraction of polluting sectors forcing essential transitions – car production, new road building, aviation, shipping, non-organic agriculture etc – consistent with achieving Net Zero and actual sustainable development, will free workers for a wide variety of essential and expanding forms of employment – public and private – such as: food production to replace producing crops for animal feed with the aim of increasing food security and achieving food sovereignty; rewilding, biodiversity restoration and commercial forestry; renewable energy including air source and ground source heat pumps for heating to replace gas and oil; expansion of education relevant to a Net Zero and carbon-negative transition; expansion of TV and film sector support to increase export potential; public transport investment in free buses for all, a 50% cut in rail fares – both encouraging a switch away from private cars; promotion of electric vehicle hire over ownership to discourage physical resource and carbon implications of continued vehicle growth; Council promotion of second-hand clothing to resist the carbon implications of fast fashion in particular.

For more than 30 years, the best way to minimise energy costs for consumers has been reduction in demand: full insulation options for all buildings; legislation to ensure all new build and sustainable retrofitting delivers buildings that do not generate carbon or methane emissions during operation and occupancy.

**Sources:**

Douglas Booth – *The Environmental Consequences of Growth,* 1998.

Herman Daly – *Beyond Growth,* 1996.

Tim Jackson – *Prosperity Without Growth –* 2nd edit. – 2016.

Colin Mayer – *Prosperity*, 2018.

Kate Raworth – *Doughnut Economics,* 2017.

Molly Scott Cato – *Green Economics*, 2009.

Dexter Whitfield – *In Place of Austerity,* 2012.

**Climate Emergency Sources:**

Campaign Against Climate Change – *Climate Jobs: building a workforce for the climate emergency,* 2021. <https://www.cacctu.org.uk/sites/data/files/sites/data/files/Docs/climatejobs-2021-web.pdf>

Climate Crisis Advisory Group – *A critical pathway for a manageable future for humanity: stewardship towards international consensus for urgent global action on climate change:* <https://static1.squarespace.com/static/60ccae658553d102459d11ed/t/6253ff0eb27d617aac93cde0/1649671961939/CCAG_PositionPaper_CriticalPathway.pdf>

Committee on Climate Change – *Joint recommendations: 2021 Report to Parliament.* Recommendations to each Government department for the improvement of Climate policies, outlining many gaps yet to be addressed. Notable that Adaptation is recommended as a policy feature for all departments, other than Defence. <https://www.theccc.org.uk/wp-content/uploads/2021/06/CCC-Joint-Recommendations-2021-Report-to-Parliament.pdf>

CPRE – *Climate Emergency: time for planning to get on the case,* March 2022: <https://www.cpre.org.uk/resources/climate-emergency-time-for-planning-to-get-on-the-case/>

Green House, Jonathan Essex and Peter Sims – *Infrastructure requirements for Zero Carbon: why we can’t build our way out of the Climate:* <https://www.greenhousethinktank.org/uploads/4/8/3/2/48324387/infrastructure-requirements-for-zero-carbon_v2.pdf>

Greenpeace – *The Climate Solutions are here,* May 2022: <https://www.greenpeace.org/static/planet4-international-stateless/2022/04/69ca2215-greenpeace-takeaways-from-the-ipcc-ar6wg3.pdf>

Institute for Global Change – the UK’s Net Zero Strategy: the 11 questions it must answer: <https://institute.global/policy/uks-net-zero-strategy-11-questions-it-must-answer>

IPCC – *Climate Change 2022: impacts, adaptation and vulnerability,* February 2022: <https://www.ipcc.ch/report/ar6/wg2/>

IPCC – *Climate Change 2022: mitigation of Climate Change -* <https://www.ipcc.ch/report/ar6/wg3/>

UK FIRES – Absolute Zero - <https://www.repository.cam.ac.uk/bitstream/handle/1810/299414/REP_Absolute_Zero_V3_20200505.pdf?sequence=9&isAllowed=y>

**Ecological Emergency Sources:**

Brotherton P., Anderson, H., Galbraith, C., Isaac, D., Lawton, J., Lewis, M., Mainwaring-Evans, T., McGuckin, S., Ormerod, S., Osowska, F., Sizeland, P., Stuart, E., Walmsley, C., Waters, R. & Wilkinson, S. (2021) Nature Positive 2030 – Evidence Report. JNCC, Peterborough. ISBN: 978-1-86107-635-9 <https://jncc.gov.uk/our-role/the-uk/nature-positive-2030/> Joint Nature Conservation Committee, Natural England and other statutory bodies on measures needed for investing in nature, people and the economy.

British Ecological Society – Nature-based solutions for Climate Change in the UK, 2021: <https://www.britishecologicalsociety.org/policy/nature-based-solutions/read-the-report/> Important contribution to immediate steps which can be taken to address the Climate Emergency – why build concrete flood defences, for example, if the cheaper option of planting might do the job instead?

Green Alliance – *Jobs for a green recovery: levelling up through nature,* 2021. A very good concise picture of the value of nature-based work in addressing inequalities. <https://green-alliance.org.uk/resources/Jobs_for_a_green_recovery.pdf>

House of Commons Environmental Audit Committee – *Biodiversity in the UK: bloom or bust,* first report of session 2021-22. <https://committees.parliament.uk/publications/6498/documents/70656/default/> Comprehensive picture of the general failings of policies regarding biodiversity in the UK.

Alice D Sacco et al – Ten Golden rules for reforestation to optimise carbon sequestration, biodiversity recovery and livelihood benefits: <https://onlinelibrary.wiley.com/doi/full/10.1111/gcb.15498>

UN Environment Programme – *Making peace with nature: a scientific blueprint to tackle the climate, biodiversity and pollution emergencies:* <https://www.unep.org/resources/making-peace-nature>

**“The call for evidence**

The aim of the call for evidence is to provide an open channel to the general public to give their views on the transition, in particular giving a voice to the public and small and medium enterprises (SMEs).

We have split up the questions into those that are answerable by all, and then those which are best answered by different groups of stakeholders.”

**Overarching questions**

1. How does net zero enable us to meet our economic growth target of 2.5% a year?

**Answer**: Conventional economic growth is not realistic on a finite planet. We need to elevate alternative economic, social and environmental indicators to provide a much broader view of success or failure by Government, local and regional government and the private sector in achieving goals relevant to achieving economic, environmental, social, political and cultural forms of sustainability for communities throughout the UK over time. The single indicator of GDP tells us nothing about grotesque inequality, educational attainment, decline of species, what types of crime are increasing/decreasing, renewable source electricity growth, decline in nuclear power as the most expensive energy source, how the country is doing on addressing its many very serious skills shortages, etc etc. in relation to the latter issue, returning to the EU and freedom of movement would clearly be of assistance. However, the restoration of the 1980s Community Programme as a department of each local council could ensure growth in skills for sustainability in each area, tailored according to needs and working with third sector organisations to enhance their role in communities.

**Sources**:

Victor Anderson – *Alternative Economic Indicators,* 1991.

Tony Juniper – *What Nature Does for Britain,* 2015.

Richard Layard – *Happiness,* 2005.

1. What challenges and obstacles have you identified to decarbonisation?

**Answer**: The UK Government, its allied corporations and the malign ‘Tufton Street’ type Climate Change deniers and market fundamentalists, made worse by the most inadequate of our newspapers, are all part of the resistance to decarbonisation. Taken together, these deficient institutions demonstrate a need for system change of a comprehensive nature to allow this country to meet its own long term needs and to serve the overall goal of protecting the Planet for future generations and species. MPs and Ministers must be prohibited from accepting payments in cash – or as goods or services – from fossil fuel and other polluting industries or propaganda organisations supporting them, or Climate Change denial. More generally, MPs should not be able to receive any funds of this type from any organisation or individual.

**Sources**:

Any rational newspaper or news media outlet. Critical analyses of Government policy by academics, environmental organisations and campaigns.

1. What opportunities are there for new/amended measures to stimulate or facilitate the transition to net zero in a way that is pro-growth and/or pro-business?

**Answer**: re-regulation to prevent business activity that worsens the Climate and ecological emergencies, and maintaining and adding to regulation which supports business activity addressing the Climate and ecological emergencies. Maintenance of past EU origin regulations/legislation and implementing new legislation from the EU, or exceeding its terms, is highly desirable. Adoption of a ‘Prosperity Without Growth’ approach throughout governance, following the work of Tim Jackson in particular. Kate Raworth’s work on the creation of a circular economy needs national, regional and local government implementation for achieving Net Zero, and reducing resource wastage. Re-use and not just recycling, needs ramping up. Dumping simplistic ideas about conventional economic growth and the efficacy of market actors to run large-scale energy industries is vital, as it is for the water industry, rail, buses or any part of the NHS. In each case, full re-nationalisation is required to ensure Climate, environment and social goals are met.

**Sources**: as given above.

1. What more could government do to support businesses, consumers and other actors to decarbonise?

**Answer**: Enter an investment phase and rebuild the tax base to provide necessary resources, skills and jobs for a more rapid Net Zero transition. To sustain a decarbonisation transformation, the following types of taxation would be needed: raised Air Passenger Duty; a Financial Transaction Tax applying to the UK and its overseas dependent territories, as part of transferring conspicuous wealth towards more productive uses; corporation tax should be set at the average of the EU States or above; non-dom status should be abolished; tax havens anywhere the UK has influence should be shut down and funds found to be illegitimate, or untraceable in origin, should be transferred to HMRC; a healthy population meaning health promotion and a wholly State run NHS; big annual increases in Active Travel spending with significant increases in sugar, cigarette and alcohol taxation; Land Value Taxation to fund local government properly, substituting for Council Tax and local business taxation: provide progressive taxation; rises in fuel duties each year to strongly encourage switching to electric vehicles; Electronic Road Pricing to replace fuel duties and invest in electric buses, as supported by the RAC and many transport academics.

Areas of public spending to cut: subsidies to fossil fuel industries to zero rapidly; stopping private sector contracts which permit cost overruns – meaning bids for work must include total realistic costs; State spending on the monarchy; trunk road building to be cut to zero permanently; infrastructure spending serving airports should cease as these need cutting back to reduce greenhouse gas emissions; subsidies to large scale private sector in general; UK military bases overseas to be minimised; reform of defence procurement to stop fraud and corruption and to eliminate cost over-runs; public sector salaries above £500,000 should be capped at that level, with inflation adjustment each year; defence spending selectively including by ensuring contracts with the private sector include cost-overruns as a penalty for delays, non-completions etc. The Crown estates should be transferred to the Government.

1. Where and in what areas of policy focus could net zero be achieved in a more economically efficient manner?

**Answer**. Given that transport is the worse sector for emissions – especially when aviation, shipping and imports are included – the opportunity must be taken to change it quickly. This would include no new trunk road building, transferring funds to Active Travel, pedestrianisation, Low Traffic Neighbourhoods and similar; free buses and much lower cost rail, requiring re-nationalisation in both cases; Electronic Road Pricing throughout the country to eliminate all forms of cross-subsidies to private transport and strongly discourage the most polluting vehicles from being used in the most congested areas; no airport expansion and conversion of some existing airports to other employment and housing uses; no port expansion as resources are needed for coastal protection; strengthening the capacity of local government to expand the diversity of its sustainable tourism offer, including the restoration and expansion of protected areas with strong means of enforcement assisted by an Environment Agency restored to at least 2010 levels of funding, and with additional powers to intervene and monitor. We should all note the Absolute Zero report, by UK Fires listed above, in which both aviation and shipping would need cutting to a very small version of their present use in the UK to ensure Net Zero by 2050, as the report’s authors indicate no general solution to today’s polluting technologies will be available widely by that date.

**Sources**:

Rose Bridger – *Plane Truth,* 2013.

Cowley Area Transport Group- *Electronic Road Pricing for Oxford* under REPORTS at [www.catg.org.uk](http://www.catg.org.uk)

Becca Massey-Chase – *Local Public Transport should be free,* <https://tribunemag.co.uk/2021/07/local-public-transport-should-be-free/#:~:text=Becca%20Massey-Chase%20Making%20local%20public%20transport%20free%20at,the%20world.%20Credit%3A%20Christopher%20Furlong%20%2F%20Getty%20Images> May 2022. Article introduces a call by the Institute for Public Policy Research calling for local public transport to by free at the point of use by 2030: a significant policy option to reduce vehicle emissions.

Colin Pooley et al – *Promoting Walking and Cycling,* 2013.

Lynn Sloman – *Car Sick,* 2006

John Sutton – *Gridlock*, 2015.

John Whitelegg – *Mobility*, 2016.

1. How should we balance our priorities to maintaining energy security with our commitments to delivering net zero by 2050?

**Answer:** full scale insulation programme for existing buildings with 100% grants for external insulation. Priority to council homes, private rental properties. Abandon hopelessly expensive nuclear power and phase out ASAP. Alter building regulations to require maximum possible solar PV on new homes, and existing buildings. Onshore and offshore wind turbine support. Training, development and implementation of air source heat pumps to replace gas and oil heating wherever it exists. 100% grants for heat pump installation for a 7 year period then review. Ground source heat pumps – with 100% grants to speed implementation for locations such as campuses, hospital grounds, industrial estates, science parks. All new homes to be at least passivhaus standard, but sustainable retrofitting should be main source of homes. Sustainable retrofitting to be compulsory for all private rental properties within a specified period, with staged increases in requirements over a period of 10 years. End fossil fuel exploration now with cancellation of existing licenses and no issue of new ones, and ensure phase out of installations with programme to ensure no methane leakage. Aim to end fossil fuel imports no later than 2030, with funding to meet renewable energy needs and insulation requirements set high enough to ensure this is done. More generally, implement policies taking into account the *Absolute Zero* report. Identify policies and strategies for a carbon negative UK, to go beyond Net Zero and make a major contribution to emissions reductions globally in the long-term – including by encouraging other States to follow this approach. Policies for going carbon negative can be started quickly, and should have five year targets to reinforce the effort. Rewilding is clearly part of this activity.

**Sources:**

Brenda Boardman – *Fixing Fuel Poverty: challenges and solutions,* 2010.

Helen Caldicott – *Nuclear Power is not the answer,* 2006.

Thomas Johannson et al – *Renewable Energy: sources for fuels and electricity,* 1993.

Paul Mobbs – *Energy Beyond Oil,* 2005.

UK FIRES – Absolute Zero - <https://www.repository.cam.ac.uk/bitstream/handle/1810/299414/REP_Absolute_Zero_V3_20200505.pdf?sequence=9&isAllowed=y>

1. What export opportunities does the transition to net zero present for the UK economy or UK businesses?

**Answer:** Increasing renewable electricity is likely to lead to export possibilities such as to France, with its deteriorating nuclear fleet of stations; UK heat pump production should have global export options; the role of renewable electricity in aviation will expand, with the UK having the best wind resources in Europe positioned for maximum renewable electricity export advantage; battery, solar thermal, electric vehicles, electric vessels are all examples of potential export areas. The UK should seek to lead an effort to cut carbon emissions from shipping to Zero. In practice, this may mean hybrid technologies for powering larger vessels including solar PV, sails, green hydrogen and appropriate scale wind turbines.

**Questions for businesses (N/A)**

8. What growth benefits/opportunities have you had, or do you envisage having, from the net zero transition?

9. What barriers do you face in decarbonising your business and its operations?

10. Looking at the international market in your sector, what green opportunities seem to be nascent or growing?

11. What challenges has the net zero transition presented to your business?

12. What impacts have changing consumer choices/demand had on your business?

13. What impacts have decarbonisation/net zero measures had on your business?

14. What more could be done to support your business and/or sector to decarbonise?

15. Do you foresee a role for your business within an expanded UK supply of heat pumps, energy efficiency, electric vehicles, hydrogen economy or clean power?

16. For clean power industry: what barriers to entry have you found in deploying new plant and technologies?

17. How many green jobs do you estimate will be created in your sector by 2030?

**Questions for the public**

18. Have you or are you planning to take personal action to reduce your carbon emissions (for example through how you travel, what you buy, how you heat your home)? If so, how?

**Answer:** Already done: This is being written in a house with external insulation, loft insulation, solar PV on the roof, fairly new double glazing, no car as occupants cycle or use buses and trains, no flying by occupants since 2013, and a significant proportion of food from UK sources.

Needed: air source heat pump to replace gas central heating

19. Do you face any barriers to doing this? What are they?

**Answer:** Need for 100% grant for air source heat pump.

20. What would help you to make greener choices?

**Answer:** Rejoining the EU and maintaining standards inherited from former UK membership until this is achieved, and ensuring new standards set by the EU are implemented in the UK. A much higher minimum pension than having the worst pension level in Europe.

21. What is working well about the measures being put in place to reach net zero?

**Answer:** At Government level, nothing. See repeated critiques of Government made by the Committee on Climate Change in particular.

22. What is not working well about the measures being put in place to reach net zero?

**Answer:** Contradictory and perverse incentives by current Government which continue and worsen both Climate and Ecological emergencies.Market fundamentalism and market failures. Expanding Government support for fossil fuels, maintenance of existing subsidies to fossil fuel industries; lack of plan for Net Zero as Committee on Climate Change has noted; lack of clear structures, policies and funding to ensure implementation of renewable energy throughout the built environment.

**Sources:**

23. Do you have any further comments on how efforts to tackle climate change are affecting you?

**Answer:** An abiding concern that today’s young people and future generations are being very poorly served by the current Government. Appalled by Government failure since 1990 to radically reduce UK greenhouse gas emissions of all types – especially in the transport and building sectors, but also in land use. It is awful that grants are not available for external wall insulation, are wholly inadequate for air source and ground source heat pumps and for solar PV and wind on agricultural buildings. There is clearly a lack of political will concerning consistent policies to cut greenhouse gas emissions, such as the continuation of completely idiotic fossil fuel industry subsidies.

**Questions for local government, communities and other organisations delivering net zero locally N/A**

24. What are the biggest barriers you face in decarbonising / enabling your communities and areas to decarbonise?

25. What has worked well? Please share examples of any successful place-based net zero projects.

26. How does the planning system affect your efforts to decarbonise?

27. How can the design of net zero policies, programmes, and funding schemes be improved to make it easier to deliver in your area?

28. Are there any other implications of net zero or specific decarbonisation projects for your area that the Review should consider?

**Questions for academia and innovators**

29. How can we ensure that we seize the benefits from future innovation and technologies?

**Answer:** Require all new build and retrofitting of homes and other buildings to be carbon-free in heating and electricity. We can all ensure that the current Government is not re-elected, as its disregard of knowledge, expertise and both Climate and ecological priorities is unprecedented as an obstruction to both innovation and technologies applicable to current conditions.

30. Is there a policy idea that will help us reach net zero you think we should consider as part of the review?

**Answer:** Abandonment of new oil and gas licenses for exploration anywhere the UK has influence. Proper regulations to ensure passivhaus standard for all new buildings and sustainable retrofitting of buildings being re-developed to ensure they are powered by renewable electricity.

\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

1. Oxford City Council has indicated it believes about one-fifth of private rental properties in Oxford are not decent accommodation. About 49% of homes in Oxford are private rentals, due to very high home costs and limited availability of council homes. [↑](#footnote-ref-1)