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**SUBMISSION: responding to consultation on ‘..operational reforms to the Nationally Significant Infrastructure Project (NSIP) consenting process’**

We will begin by questioning the assumptions behind National Infrastructure projects. This is essential because giving consent to such projects should require far more rigorous consent-determining criteria than seem to have been applied to date. Putting this simply, the Climate and ecological emergencies and social justice need to be rigorously applied to ensure any new national infrastructure is actually needed. Also, matters of key national infrastructure which have been neglected in favour of new infrastructure need attention – meaning in practice some types of project or programme should be delayed or blocked indefinitely so that sufficient funds are used where most needed, for things of obvious importance such as repair and maintenance.

**PART ONE – ASSUMPTIONS AND OMISSIONS**

Assumptions which the consultation document does not consider as part of criteria to determine consents, despite their importance, include:

**HS2 or other better railway investment**: HS2 is now rated unachievable after billions spent, attenuation of the project and considerable environmental damage.[[1]](#footnote-1) Far more necessary, as part of decarbonising railways and increasing alternatives to car movements, is a fully electrified railway system. Currently, plans to electrify the UK’s railways are running so far short of what is needed that it would take 240 years at current rates to reach the net zero goal. Over a three-year period, to the end of 2025, the UK is set to electrify 162.5km (101 miles) of railway track, which is only about 12% of need to reach the goal of net zero greenhouse gas emissions by 2050.[[2]](#footnote-2) Equally important is the absence of a well-funded programme to restore disused rail lines and to consider whether new underground rail systems are needed in areas of highest traffic congestion. These are clearly national priority decarbonisation measures. However, so far, funding for re-opening disused lines has been derisory.[[3]](#footnote-3) In the Oxford context, the re-opening of the Cowley rail line and of the Oxford to Witney/Carterton line would be vital traffic reduction contributions to a City suffering from serious traffic congestion and severe over-capacity usage of junctions in the rush hour-school runs. But there is no definite timing for the completion of either essential project. However, the development of criteria to determine whether highly congested areas, such as Oxford, merit investment in underground rail schemes, linked into the existing rail network, also remains to be done. All of these initiatives can be considered important national infrastructure; all are neglected in large part because of avoidable financial focus on HS2, and poor use of the current tax base, and a consent process that does not favour Climate and environmental considerations and priorities, or social justice in terms of ensuring the needs of poorer communities are met with UK-wide infrastructure programmes that are of use in such localities such as pavement repair, sustainable retrofitting in the built environment to meet the demand for very low cost housing etc.

**Large-scale infrastructure using fossil fuels and physical resources, or decarbonisation and cutting GHGs:** The Government has promoted the idea of decarbonisation but the transport sector in particular requires a fundamental reappraisal and entirely different policies to cut carbon emissions and other GHGs being released into the atmosphere.[[4]](#footnote-4) It is, after all, the major UK sector for carbon emissions, contributes substantially to air pollution, and both kills people and undermines public health. These major problems should determine whether any transport-related consents are needed, meaning that such consents which increase GHGs should always be refused. This is occurring despite the abundant research and Government documentation on these topics. The Committee on Climate Change has made it clear that it does not consider the Government to have credible policies to reach its own Net Zero by 2050 targets.[[5]](#footnote-5) Criticism of Net Zero has also been accumulating.[[6]](#footnote-6) The Climate Change Advisory Group has said we need net-negative emissions, with the term ‘carbon-negative’ already in use by some,[[7]](#footnote-7) and CCAS noted: “..net zero greenhouse gas emissions by 2050 will not achieve the long-term temperature goals identified in the Paris Agreement.” The creation of more new infrastructure resulting in more GHG emissions, and more use of scarce resources including in all aspects of the construction process, is a national infrastructure fail in waiting. New infrastructure, where existing infrastructure cannot be upgraded, needs to occur within a framework of zero GHG emissions, reflected in a far more rigorous consent process. Since alleged transport demand is often used to justify new infrastructure – roads, ports, airports etc – whilst transport is the largest source of UK carbon emissions – it follows that the deepest cuts possible should fall on transport to ensure the 1.5 degree C threshold is not breached.[[8]](#footnote-8) In practice, scrappage schemes should apply to cars, vans, HGVs and other vehicles to accelerate the decline of ICE/diesel vehicles on our roads. Additional VAT on larger ICE vehicles still on sale would help to increase the sales or hire of EV equivalent vehicles.

**Cost overruns on infrastructure:** Infrastructure projects are notorious for delays and cost overruns.[[9]](#footnote-9) We advocate full-cost bids by those contracting to build such infrastructure, backed up by legislation. Companies should be required to insure themselves against cost overrun risks, and not expect public funding when this occurs. Nuclear power is exceptional for cost overruns and delays, making it the worst form of private and public investment failure.[[10]](#footnote-10) This must mean an end to consent criteria permitting any new nuclear power construction. We also note that all of the UK’s private water companies are heavily indebted, demonstrating water privatization as both a market and national infrastructure failure.[[11]](#footnote-11)

Government guidance on public procurement states that, ‘The over-riding procurement policy requirement is that all public procurement must be based on value for money, defined as “the best mix of quality and effectiveness for the least outlay over the period of use of the goods or services bought”. This should be achieved through competition, unless there are compelling reasons to the contrary.’[[12]](#footnote-12) However, the frequent cost overruns and delays on major infrastructure projects make it clear that the current system is not achieving value for money: the cheapest bid is not always the best quality bid. We suggest public procurement must meet Climate, ecology and social justice criteria as higher priorities than alleged cost-effectiveness.[[13]](#footnote-13) The concept of cost-effectiveness needs revisiting with regard to securing longer life for refurbished or new infrastructure.

The Public Services (\*Social Value) Act 2012 requires that at the pre-procurement stage the social, environmental, and economic well-being of the area in which the contract will be applied should be considered. However, no evidence can be found that Environmental concerns form any part of local or central government decision making. On the contrary, the UK is the most nature depleted country in Europe.[[14]](#footnote-14)

In 2021 the government issued guidance on public procurement which required that suppliers bidding for major government contracts should commit to achieving Net Zero by 2050 and publish a ‘Carbon Reduction Plan’. [[15]](#footnote-15) Again, this appears to have had no practical effect given the UK’s lack of progress on net Zero.[[16]](#footnote-16) It also needs to be extended to all public procurement contracts, not just major government ones.

Such matters need to be properly enforced and the officers enforcing them need retraining. Local government, the Environment Agency and Natural England all need to be allocated sufficient resources to properly monitor and enforce net Zero and ecological policies. Net Zero needs to become an overarching policy which is given priority over value for money requirements for public procurement, until such time as adequate carbon-negative policies replace the idea of ‘Net Zero’.

**National versus local infrastructure:** The national infrastructure process of consents should meet tests such as: to what extent greater local benefit might arise by spending dispersed to many other projects in local council areas. For example, instead of spending c£27-30bn per year on new trunk roads, inducing far more traffic and journeys,[[17]](#footnote-17) the same funds could go to: Active Travel, to promote health and reduce traffic; road surface renewal and repairs, as there is a c14 year backlog of road repairs; pavement repairs; a pavement parking ban, to gradually reduce damage to pavements, as in London and in process in Scotland and Wales; more low traffic neighbourhoods, pedestrianised areas and controlled parking zones. There is also the issue of local government funding cuts, and the basic principle of localisation: placing emphasis on the restoration of local government funding, using for example Land Value Taxation in place of council tax and business rates to create a genuinely progressive form of local taxation for the first time. Localisation as a test of whether a lot of proposed new national infrastructure is needed, alongside decarbonisation of physical processes, such as in buildings and refurbishments and of the transport sector is general, could help to ensure local infrastructure meets local needs, such as for replacement bridges, rather than continuing with assumptions about the benefits alleged for national infrastructure.[[18]](#footnote-18) It would serve to re-legitimate the political system by delivery of more sustainable improvements within communities. Such national programmes of local infrastructure renewal or replacement are, arguably, going to spread benefits to more communities than new trunk road, airport or port expansions ever will. Therefore, a consents process for national infrastructure should favour programmes of locally beneficial infrastructure and refuse all environment and Climate damaging large-scale projects.

**NHS and schools needs over roads, ports and airports:** The Government has a new programme for hospitals.[[19]](#footnote-19) Responding, the National Audit Office indicates that the claimed 40 new hospitals will not be completed by 2030, partly because of failures in the process of commissioning causing delays. Given an increasing and ageing population, this is unacceptable and requires reconsideration of how new hospital capacity may be achieved and funded, including the better use of existing NHS sites with taller structures, and more accommodation for staff given very high housing costs. With regard to schools, the Government has made a variety of statements concerning new schools in particular.[[20]](#footnote-20) However, the overall programme has been too slow to prevent closure of classrooms which are deteriorating through neglect and a lack of replacements.[[21]](#footnote-21) In short, building and rebuilding hospitals and schools and making them zero carbon when functioning is a far higher priority than new roads; additional port infrastructure; expansion of transport infrastructure serving airports to sustain their expansion despite human-created Climate Change. Criteria for consent should recognise these priorities in the coming decades, and the need to ensure state control of and adequate spending on the NHS and education.

**Mobility:** National infrastructure additions such as roads in particular are about values, not necessarily about actual needs. The Newbury by-pass achieved only about 3 years of reduction of traffic in the middle of Newbury and is an example of the expensive failures of the by-pass idea. Road building across the Oxford-Cambridge Arc for the 1% of people travelling/commuting across this axis will be about placing a higher value on road building than the compelling evidence that it is not needed. The National Infrastructure Commission has reported quite clearly that Oxford, Milton Keynes and Cambridge are each centres of commuting serving their roles as employment centres. Their report on the topic did not provide any evidence in favour of new road building across the Arc.[[22]](#footnote-22) Mobility/commuting for work in particular can be diminished further by introducing a right to remote working for all appropriate types of work; supporting a four-day week, which has been found to have no negative effects on productivity;[[23]](#footnote-23) also giving a right to flexitime for the widest possible range of types of employment. These quality of life measures are far more important to households than mobility options by car, particularly as soaring road traffic does need to be met by traffic reduction measures including those mentioned above. Professor John Whitelegg has written a compelling argument for reducing mobility, by personal choice, as a contribution to things such as self-confidence, spatial ability and relationship skills.[[24]](#footnote-24) Child development is an issue when children are being ferried everywhere rather than spending more time communicating with other children during their school day journeys. Growth in mobility is partly about the availability of vehicles at home to expand numbers of journeys, partly about poor public transport investment and high costs especially for rail in the UK, very low investment in Active Travel especially in England despite the health promotion benefits, and the concentration of some (and fewer) facilities in larger and larger units in large geographical areas, prompting longer journeys for many. Secondary schools, hospitals and GP practices are examples of this neglectful practice in the UK. Whitelegg offers a list of ‘negative consequences’ from increasing levels of mobility, meaning the use of cars particularly. These are: air pollution; death and injury on the roads; energy consumption; Climate Change; obesity and related health impacts; community disruption; reduction in equality and social justice; fiscal burdens.[[25]](#footnote-25)

**Cargo bikes and ecargo bikes and the infrastructure they need:** Traffic reduction, and avoidance of increases in the number of vehicles, requires far more use of cargo bikes and ecargo bikes for deliveries - using wider cycle tracks, in our urban areas.[[26]](#footnote-26) This is critical local infrastructure helping to increase cycling and reduce delivery vehicle movements inside urban areas. Big increases in light commercial vans and Electric vans are occurring,[[27]](#footnote-27) adding to the burden of traffic inside communities, whether these are delivery vehicles or for other uses such as by construction companies and utilities. The RAC comments: ‘At the end of December 2022, there were 40.7 million licensed vehicles in the UK, which was a 1.0 per cent increase compared to the end of December 2021, and a 2.3 per cent increase compared to the end of December 2020. Cars make up the majority of licensed vehicles. In the United Kingdom, there were 33.2 million cars (81.5 per cent), 4.63 million LGVs (11.4 per cent), 0.54 million HGVs (1.3 per cent), 1.36 million motorcycles (3.3 per cent), 0.15 million buses & coaches (0.4 per cent) and 0.84 million other vehicles (2 per cent) licensed at the end of September 2022. The total number of licensed vehicles has increased in all but two years (1991 & 2020) since the end of the Second World War.” Concerning vans, the RAC notes: ‘In the last 25 years, van traffic has seen the fastest growth (in percentage terms) of any motor vehicle, increasing 106 per cent to 55.5 billion vehicle miles in 2019. This rapid rise in van traffic now means that van traffic as a proportion of all motor vehicle miles has increased from 10 per cent to 16 per cent over the same period. The number of vans in Great Britain has also increased substantially over the last 25 years, increasing 101 per cent from 2.2 million licensed vans in 1997 to 4.5 million licensed vans in 2022.’[[28]](#footnote-28) In short, infrastructure which supports the expansion of cargo bike use, serving expansion of cycling for public health, will also be invaluable for helping in road traffic reduction, especially within urban areas. Consents, and Highway Authority regulations, must favour a general expansion of cargo and ecargo bike use with better cycle tracks throughout England particularly, but wherever justified in the UK as well. Also, new, renewed and refurbished infrastructure requires a consistent overall goal of traffic reduction year on year.

**PART TWO: THE CONSULTATION DOCUMENT**

**Section 1.2 no 2** We reject the idea that speedier consents are desirable. We reject the idea that planning or infrastructure consent processes should be aimed at permitting new development as a normal outcome. This should be an exceptional outcome as existing infrastructure renovation and re-use should be paramount, as should decarbonisation of all processes associated with this.

**Section 1.2 no 3** The Environment Agency was never well-funded, and a three-quarters cut in its resources since 2010 has not helped. To have good use of infrastructure, avoiding creation of new infrastructure generally, means giving new powers and far more resources to the Environment Agency to block anti-environment and anti-Climate developments. The presumption that national infrastructure can just override countryside designations or other environmental concerns should cease. We are the most nature-depleted country in Europe, and one of the worst in the world for wrecking our own environment and continuing to allow expansion of GHG producing activities, for example in the aviation and shipping sectors.

**Section 1.2 no 5** Given poor investment in schools, notably in class size reduction, we cannot see skills shortages being well-addressed within the UK in the foreseeable future. We need to make this one of the national public spending priorities and to return to freedom of movement with European States as soon as possible - to create a better skilled workforce.

**Section 2.1** We regard consultation which denies local authorities a veto on national infrastructure with negative effects in their area. The should also be able to: make major amendments to such proposals or place demands on national Government for locally-important infrastructure repair/renovation. Currently, we see consultations as a largely ritualistic exercise. Institutionally, we need to engage in nature restoration and far better Climate policies. This means saying no to unsustainable developments of all kinds, until those proposing them ensure their proposals are fit for a more environmentally-aware future. Consents need to be conditioned by legislation which makes this so.

**Question 1:** Yes, there should be a chargeable pre-application service for planning applications for national infrastructure. Applications made which are found unsustainable must be rejected, and further or revised applications should not be claimable as a business expense. This places an onus on applicants to do a far better job of conforming to adequate and fully enforced environment and Climate policies.

**Question 4:** The consultation document and the subsequent question are: “Our policy objective is: to make the pre-application stage more effective in identifying and resolving, or reaching clear positions on potential examination issues. Question 4: T what extent do you agree that the overall proposals for merits and procedural advice will enable the policy objective to be met?”

Our response: This needs to be re-cast to strengthen blocking and delaying processes and the use of more restrictive legislation which places far more emphasis on better use of existing infrastructure, wherever possible. Also, objectors are thoroughly disadvantaged in examination conditions given the need to raise funds to oppose developers who are able to claim their costs as business expenses, and are permitted to succeed even if environmental damage and more GHG emissions result. So, the whole section needs rewording, and planning legislation needs amending – including for the State to cover the costs of objectors in hiring barristers, commissioning their own studies, etc. It should be the job of the Planning Inspectorate to favour infrastructure programmes supporting locality needs with minimal environmental impact, not to facilitate environment-wrecking proposals like HS2 and new trunk roads.

**Table 2.1**

District councils and Unitary councils are not specified as statutory consultees on this list. Please also add another list of national non-governmental organisations as consultees. This list should be open for any national NGO to add itself as a consultee. Since consultation will take place via email, so adding additional groups to the circulation on national infrastructure is a ‘no cost’ action. This answers:

**Question 6 & Question 7**

**Question 8 & Question 9** Consultation arrangements in the pre-application process must be offered to NGOs to comment. Also, given the problematic assumptions we have often found in local and national consultation documents, this pre-application stage should include the opportunity for national NGOs and statutory consultees to question the assumptions behind the proposal and call into question its legitimacy if it conflicts with environmental legislation and Climate necessities. Both of these need strengthening in new legislation and better-funded regulatory bodies. In short, we expect the overall process to seek 100% environment and Climate protection as basic goals, and to be consistent with a just transition to a sustainable society as long identified in literature on the creation of a Green New Deal in the UK.[[29]](#footnote-29)

**Question 10** We consider multiple consultations to be a process of wearing down, or at best fobbing off, legitimate objectors and disregarding their prudent objections. We favour NGO participation in pre-application processes to help filter out ‘non-starters’ – applications that are destructive and riddled with the risks of cost overruns; and then a single consultation with a lengthy period for comments if the proposals have been fully amended to ensure environmental, Climate and social justice concerns have been made paramount. There can be no mission to compel objectors into ‘enthusiasm’ for illegitimate projects. Let us give an example:

A flood alleviation channel is proposed for the western side of Oxford, at high and rising cost. The Lye Valley, Headington in Oxford, model of using ‘leaky dams’ to protect and increase the peatland area of this valley has already been shown – after 10 years of mainly voluntary labour – to have reduced flooding downstream of the Lye Brook/Boundary Brook. If each brook leading into areas of flooding on the west side of Oxford were given ‘leaky dams’ and peatland restoration works, then resources would be saved and the carbon storage of restored and extended peatlands would be considerable. This is possible for a fraction of the £125-150m it would cost to dig out a flood alleviation channel. Peat stores more carbon in comparable areas than a tropical rain forest does. See website of Friends of Lye Valley for this highly important form of nature restoration, which is essentially ‘physical infrastructure saving.’[[30]](#footnote-30) As a general principle, any suggestion of national infrastructure should be assessed alongside lower cost measures benefiting localities. It cannot be the purpose of national infrastructure programmes or projects to fail in cost-effectiveness by supporting the most invasive and expensive forms of new infrastructure development.

**Question 11** Expenditure on consultations and examination in public could be cut if there was a strong emphasis on addressing local infrastructure needs. For example, stop trunk road building and do road and pavement repairs instead, with the addition of cycle tracks suitable for the widest size of cargo and ecargo bikes.[[31]](#footnote-31)

**Question 12** is: “To what extent do you agree with the proposal to remove the prohibition on an Inspector who has given section 51 advice during the pre-application stage from then being appointed to examine the application, either as part of a panel or a single person.”

We are opposed to this, and reject the existing system of appointments which seem to us either to be biased towards development. We believe inspection in public should mean that national NGOs have approved the individual inspector or all the members of a panel to ensure environment, Climate and social justice issues are given appropriate and overriding weight in deliberations.

**Question 13** “To what extent do you agree that it would lead to an improvement in the process if more detail was required to be submitted at the relevant representation stage?” We agree, provided national NGOs are funded to create and submit reports to help democratise this process. We have already indicated that district and Unitary councils should be statutory consultees.

**Question 14** Shorter notification periods in any part of this process of refusing or allowing consents is entirely inappropriate. Longer periods should be required to allow non-commercial bodies more time to commission reports/write submissions. To assist this, pre-application documents should be placed online to allow NGOs and local authorities to assess and comment upon their contents. We note that major environmental NGOs are prepared to mobilise their 20 million supporters to resist steps taken by Government which undermine Net Zero and environment policies.[[32]](#footnote-32) Clearly, enough time needs to be allowed for such groups – as consultees on national infrastructure – to communicate with their members, make submissions at pre-application and final application stage, and to commission their own reports at public expense to ensure a more equitable and democratic process when dealing with national infrastructure.

**Question 15** Yes, we agree digital documentation should be used for examination purposes, with longer periods for consultation submissions.

**Question 16** The submission of additional ‘planning data’ may reflect the past career history of those writing it, rather than improved legislation for environmental protection and the Climate Emergency which the UK badly needs. We think this data addition should not be allowed until comprehensive re-training of those submitting such data has occurred. Apart from any new legislative context, there should be far more consideration of the inbuilt assumptions in planning legislation which do not necessarily protect the environment, the Climate or indeed people.

**Question 18** We do not think national infrastructure proposals of any type should be fast-tracked. It would be better if environment and Climate damaging proposals are blocked at the pre-application stage, to save a lot of public money for things – such as those suggested above – of greater use.

**Question 19** We reiterate that we reject fast-tracking and want far more time for NGO and private individual engagement with proposals. As part of this, we want the Secretary of State to no longer have a role in national infrastructure. In short, national Government should not be able to call in applications where local decisions have protected environment, Climate and the public interest. The Planning Inspectorate can be re-tasked and re-trained, with new leadership, to ensure fairness in the system and very close conformity to environmental, Climate and justice goals.

**Question 21** No fast tracking to be permitted.

**Questions 22 & 23** Applicants, as part of the pre-application process, must share queries, updates and advice they are seeking with national NGOs and so must the Planning Inspectorate. We do not accept the idea of commercial confidentiality where any public spending is involved.

**Question 24** NGOs should be able to adjudicate whether a change in an application is non-material or not, thereby forcing the issue concerned into consultation processes. 26 weeks seems a reasonable time for NGOs to assess such an alleged non-material addition to an application.

**Questions 25 & 26** Yes, commercial applicants should pay towards a cost-recoverable pre-application service. We don’t believe statutory bodies should. Failure to get consent from an application for national infrastructure after going through the rigorous process of assessment we suggest should mean further applications to achieve the same goals would not be permissible.

**Questions 27 & 28** We agree with charging to cover costs, and that this may be raised in line with rising costs each year.

**Question 29** Requests comment on fees etc for which no information is provided, so it is unreasonable to ask this question.

**Question 30, 31, 32** Key performance measures are only as good as the availability of skilled human resources to assess whether they are being achieved. Once again, it is not reasonable to ask this question without such evidence being available in the consultation document.

**Questions 33-37** Statutory consultees should be able to charge applicants in full for planning services concerning national infrastructure proposals. Compliance with national legislation on the environment, Climate and social justice are to be a required part of applications and statutory consultees must reject applications which seek to avoid these constraints.

**Question 38** The proposals offered in the consultation document will not result in more effective engagement with communities unless it is possible for people to see that wrecking proposals can be refused with no hope of repeat or revival. The current planning system delegitimises the idea of democracy, or of measures for sustainability or justice.

**Questions 40-41** We refer the authors to the Foreign Office shortage occupations lists on its website for current details of skills shortages; we refer to our own comments above about more investment in education to address skill shortages, particularly with emphasis on bursaries and grants, and an end to student loans, to ensure better support for FE and HE students.

**Question 42** Is too broad to be considered reasonable.

**Questions 43 & 44** Planning guidance should be a more formal and enforced code of conduct to help raise standards in terms of what is being delivered, how it is delivered, and for how many decades ahead any refurbished or new infrastructure is designed to last. ‘Guidance’ may be altogether too flexible and provide too much scope to applicants to avoid proper restraints upon Climate and ecological impacts.

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1. See: <https://www.itv.com/news/2023-07-30/hs2-rated-unachievable-by-major-projects-body> & <https://www.bbc.co.uk/news/business-54538639> & <https://www.theguardian.com/uk-news/2023/mar/09/parts-hs2-delayed-two-years-cut-soaring-costs-rail-project> & <https://theecologist.org/2020/feb/05/hs2-risks-devastating-environmental-damage> & <https://www.bbc.co.uk/news/science-environment-64558664> [↑](#footnote-ref-1)
2. Summary of this article based on report given in the daily newsletter of the Nuclear Free Local Authorities. <https://www.theguardian.com/uk-news/2023/jul/29/rail-electrification-plans-fall-far-short-of-uk-net-zero-targets-data-shows> [↑](#footnote-ref-2)
3. See: <https://www.gov.uk/government/news/moving-ahead-to-reopen-railway-lines-and-stations-including-one-not-used-since-reign-of-king-george-v> [↑](#footnote-ref-3)
4. On transport, see: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf> On industry: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/970229/Industrial_Decarbonisation_Strategy_March_2021.pdf> On land use, etc: <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/996062/lulucf-local-authority-mapping-report-2019.pdf> [↑](#footnote-ref-4)
5. See for example: <https://www.theccc.org.uk/2022/06/29/current-programmes-will-not-deliver-net-zero/> [↑](#footnote-ref-5)
6. See as examples: <https://www.theguardian.com/environment/2021/oct/28/net-zero-is-not-enough-we-need-to-build-a-nature-positive-future-aoe> & [https://static1.squarespace.com/static/60ccae658553d102459d11ed/t/61275c5abba2ec034eefb534/1629969503477/CCAG+The+Final+Warning+Bell.pdf](https://static1.squarespace.com/static/60ccae658553d102459d11ed/t/61275c5abba2ec034eefb534/1629969503477/CCAG%2BThe%2BFinal%2BWarning%2BBell.pdf) & <https://www.clientearth.org/latest/latest-updates/news/uk-net-zero-strategy-why-it-won-t-work/> & <https://theconversation.com/climate-scientists-concept-of-net-zero-is-a-dangerous-trap-157368> [↑](#footnote-ref-6)
7. See: <https://www.climatecouncil.org.au/bhutan-is-the-world-s-only-carbon-negative-country-so-how-did-they-do-it/> & <https://www.iea.org/commentaries/going-carbon-negative-what-are-the-technology-options> & <https://www.carbonnegative.org.uk/> [↑](#footnote-ref-7)
8. See this academic report indicating a need, for example, to cut aviation and shipping emissions to a minimum by 2050. In effect, it would make both more like emergency services. However, steps to do so would force these industries towards decarbonisation, including electrification and green hydrogen use: <https://api.repository.cam.ac.uk/server/api/core/bitstreams/75916920-51f6-4f9c-ade5-52cbf55d5e73/content> [↑](#footnote-ref-8)
9. See: <https://www.thelondoneconomic.com/politics/new-report-exposes-17bn-of-overruns-on-major-government-projects-157750/> & <https://www.ice.org.uk/media/vmhdu4jc/ice-report-reducing-the-gap-between-cost-estimates-and-outturns-for-major-infrastructure-projects-and-programmes.pdf> & <https://probuildermag.co.uk/features/megaprojects-the-uks-five-most-costly-infrastructure-projects> & on nuclear power: <https://www.theguardian.com/uk-news/2019/sep/25/hinkley-point-nuclear-plant-to-run-29m-over-budget> & <https://www.bbc.com/news/uk-england-suffolk-66364639.amp> [↑](#footnote-ref-9)
10. See: <https://theecologist.org/2021/dec/13/nuclear-powers-economic-failure> & <https://news.sky.com/story/why-taxpayers-will-share-the-pain-of-cost-of-building-sizewell-c-nuclear-power-plant-12758003> [↑](#footnote-ref-10)
11. See for example: <https://www.theguardian.com/environment/2023/jun/28/mounting-debts-and-public-anger-could-finally-sink-uk-water-companies> [↑](#footnote-ref-11)
12. <https://www.gov.uk/guidance/public-sector-procurement-policy> [↑](#footnote-ref-12)
13. See works by Dexter Whitfield on these topics e.g. *Public Services or Corporate Welfare: rethinking the nation State in the global economy,* 2001. [↑](#footnote-ref-13)
14. See: <https://www.nhm.ac.uk/discover/news/2020/september/uk-has-led-the-world-in-destroying-the-natural-environment.html> & <https://www.itv.com/news/2021-10-10/uk-is-one-of-the-most-nature-depleted-countries-in-the-world> [↑](#footnote-ref-14)
15. <https://www.gov.uk/government/publications/procurement-policy-note-0621-taking-account-of-carbon-reduction-plans-in-the-procurement-of-major-government-contract> [↑](#footnote-ref-15)
16. See for example: <https://www.theccc.org.uk/2022/06/29/current-programmes-will-not-deliver-net-zero/> [↑](#footnote-ref-16)
17. The substantial research giving evidence on induced traffic, going back to the 1920s, is ignored or belittled by Highways organisations, prompting a need for entirely new leadership of such bodies. A major introduction to the problem of induced traffic is: Trunks Roads and the generation of traffic by SACTRA: <https://www.thenbs.com/PublicationIndex/documents/details?Pub=DOT&DocID=258178> [↑](#footnote-ref-17)
18. For the wider arguments on localisation, see Colin Hines – *Localization,* 2000: Helena Norberg-Hodge – *Local is our future,* 2019. [↑](#footnote-ref-18)
19. See: <https://healthmedia.blog.gov.uk/2023/05/25/new-hospital-programme-media-fact-sheet/> [↑](#footnote-ref-19)
20. See: <https://educationhub.blog.gov.uk/2022/12/16/building-new-schools-your-questions-answered/> & <https://www.gov.uk/government/news/thousands-more-school-and-sixth-form-places-to-be-created> & <https://www.gov.uk/government/publications/school-rebuilding-programme/school-rebuilding-programme> [↑](#footnote-ref-20)
21. <https://www.theguardian.com/education/2023/jun/29/pupils-in-england-sent-to-churches-and-village-halls-as-crumbling-schools-close> [↑](#footnote-ref-21)
22. <https://nic.org.uk/app/uploads//Running-out-of-Road-June-2018.pdf> [↑](#footnote-ref-22)
23. <https://www.nytimes.com/2022/09/22/business/four-day-work-week-uk.html#:~:text=Most%20of%20the%20companies%20participating%20in%20a%20four-day,to%20a%20survey%20of%20participants%20published%20on%20Wednesday>. & <https://interestingengineering.com/health/four-day-workweek-is-better-for-everyone> & <https://www.scientificamerican.com/article/a-four-day-workweek-reduces-stress-without-hurting-productivity/> [↑](#footnote-ref-23)
24. See: John Whitelegg – *Mobility,* 2016. [↑](#footnote-ref-24)
25. Whitelegg, 2016, p.28. [↑](#footnote-ref-25)
26. See chapter 6 of Department of Transport, Local Transport Note 1/20, July 2020. [↑](#footnote-ref-26)
27. <https://www.smmt.co.uk/2023/06/new-van-market-maintains-growth-in-may/> & [↑](#footnote-ref-27)
28. <https://www.racfoundation.org/motoring-faqs/mobility> [↑](#footnote-ref-28)
29. See the original proposals on this: <https://greennewdealgroup.org/a-green-new-deal/> & some costings: <https://greennewdealgroup.org/how-to-pay-for-the-green-new-deal-a-briefing/> [↑](#footnote-ref-29)
30. <http://www.friendsoflyevalley.org.uk/> [↑](#footnote-ref-30)
31. See LTN 1/20. [↑](#footnote-ref-31)
32. See for example: <https://www.theguardian.com/environment/2023/jul/29/nature-groups-prepared-to-mobilise-members-over-uk-climate-policy> [↑](#footnote-ref-32)