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To: BEIS Net Zero Review team
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Net Zero Review – Call for Evidence

This letter is submitted on behalf of the Association of Directors of Environment, Economy, Planning & Transport (ADEPT) by Hannah Bartram, Chief Executive Officer. It is not confidential.

ADEPT is a professional membership association representing Place Directors from county, unitary and combined authorities across England, along with Local Enterprise Partnerships, sub-national transport boards and corporate partners drawn from key service sectors throughout England.

Headline messages

ADEPT welcomes the review and in particular the assurance given by the review Chair, Chris Skidmore MP, in his speech on 29th September launching the call for evidence that “it’s essential government delivers net zero... it isn’t just about going green, it is essential for future economic growth.... net zero is going to benefit the lives of people across every region.” This is the central message that we fully support – the 2050 net zero target is vitally important in its own right but also because it is essential for growth, the natural environment, and tackling social inequalities.

We welcome the opportunity to make some initial comments now, and to suggest ways in which further engagement with the local government sector can be secured to contribute to the review (not least because the timescale of this call for evidence is considerably shorter than that for many government consultations). We welcome the statement that the review will include a range of themed roundtables including one with the local government sector. We suggest that in addition to talking to leading councillors (whether via the Local Government Association or more directly), the review Chair and secretariat meet with the Place Directors and other senior officers who represent the sector on the Local Net Zero Forum.

Our policy on climate change and green growth is set out in our [policy position](#) published in May 2022. The key messages are:

- Local action is critical to deliver on net zero and climate change action, but this can only be achieved with co-ordinated leadership, support and resource from government, including a clear framework for delivery, coherent policy and powers for councils and appropriate long-term funding.

- Behaviour change is key, and councils are uniquely well-placed to provide the local infrastructure required to support change. More than half of the emission reductions we need to reach net zero rely on households and businesses adopting low-carbon solutions.
- Ensuring climate resilience in our places is vital: net zero cannot be achieved without preparing to adapt to already ‘baked in’ changes to the climate. We must do more to build resilience into local and national infrastructure, and to design and deliver our place-based services with this in mind.
- Tackling climate change must work in parallel with levelling up. We must address the human and environmental outcomes as well as the economic. To do this at place level will require local authority leadership to ensure that clean growth and green skills are intrinsic to local economic plans.
- ADEPT is calling on government to ensure policies and funding across planning reform, levelling up, place-based infrastructure, health disparities, environment and international trade are properly integrated and fully aligned with the Net Zero Strategy and the National Adaptation Programme. Climate change and green growth must be the key drivers across these policy areas.

In addition to a coherent policy framework, powers and funding the government must also give clear leadership and consistent messaging – local councillors, businesses and residents all need to hear an unambiguous message from the most senior members of the new government that they remain committed to the net zero target and determined to develop robust programmes to deliver it. Without this, stakeholders will feel that net zero is now a lesser priority to take into account when setting their own plans, budgets and behaviours. The national political turmoil this year has taken the focus away from climate change and risks undermining the shared commitment to decarbonisation and adaptation.

It is not just our sector that recognises the essential role that local authorities have in achieving net zero. The Climate Change Committee acknowledges the important role of local authorities and the contribution they are already making for example in insulating fuel poor homes. Similarly the National Audit Office (NAO) reports [Achieving Net Zero](#) in December 2020 and [Local Government and Net Zero in England](#) in July 2021 concluded that local authorities will have a critical part to play but also highlighted “serious weaknesses in central government’s approach to working with local authorities on decarbonisation, stemming from a lack of clarity over local authorities’ overall roles, piecemeal funding, and diffuse accountabilities. This hampers local authorities’ ability to plan effectively for the long-term, build skills and capacity, and prioritise effort.”

ADEPT is part of the [Blueprint Coalition](#), an influential coalition of local government organisations, environmental groups and research institutions. Together, we are calling on the government to support local authorities in delivering climate action with a joined-up approach that also helps nature recovery and reduces inequalities across the country.

We have identified five immediate priorities:

- Invest in low-carbon and climate-resilient infrastructure including public transport, renewable energy and electric vehicle charging.
- Support reskilling, retraining and research to accelerate the move to a net-zero economy.
- Upgrade our existing homes to ensure they are fit for the future and ensure new housing is zero carbon.
- Make it easy for people to walk or cycle and work remotely.
- Accelerate tree planting, peatland restoration, green spaces and other green infrastructure.

The Coalition set out a comprehensive set of recommendations for how the right support from government could help local authorities decarbonise their places, boost sustainable economic growth, and restore nature. The Coalition has carried out [an assessment](#) of progress against each of these over the last two years; this will be submitted to the Net Zero Review. We urge the review team to take account of this assessment and to engage with the Coalition as part of its collection of evidence.

Overarching questions

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

Net zero is essential for future economic growth. Green growth through the low carbon economy drives growth and employment. Place-based investment in net zero will create new skills and jobs. This is supported by research from the Local Government Association (LGA), which shows that 700,000 direct jobs could be created in England's low-carbon and renewable energy economy by 2030, rising to more than 1.18 million by 2050. Many of these jobs could help people transition from high to low carbon industries. Investing in renewable energy generation and storage will also reduce energy costs and improve security.

Investing in resilient local and national infrastructure reduces the cost and adverse effect on future growth of the damage and disruption caused by floods and other extreme weather events caused by climate change. There are huge economic and social costs of inaction – the UK Health Security Agency has warned this month that the climate emergency would bring wide-reaching health impacts with food security, flooding and mosquito-borne diseases posing threats.

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

Short-term costs: achieving carbon neutrality can be more expensive up front than continuing business as usual (e.g. capital cost of building zero carbon homes, schools and workplaces) even though long-term costs are reduced. This perpetuates continued over-reliance on fossil fuels and imported energy. The government's Growth Plan 2022 must not see decarbonisation as an alternative to growth or something that can be slowed down to reduce short-term investment costs.

Lack of clear leadership and consistent messaging from government (as mentioned above and highlighted by the CCC and NAO) – the national political turmoil this year has drawn Ministers' attention away from net zero and led to speculation that it is no longer such a high priority. This has not been helped by some Ministers supporting a switch back to greater reliance on fossil fuels (including shale gas, before the new Prime Minister reinstated the moratorium on fracking) or steps to reduce the land available for renewable energy. We need clear communications to reinforce the key messages that net zero and economic growth go together and are not in competition with one another, and that future energy security depends on further successful growth of the decarbonised energy sector. Government also has an important role in reinforcing behaviour change such as encouraging people to reduce energy use and help with the cost-of-living crisis.

Many businesses do not yet have robust decarbonisation plans. The Climate Change Committee has just published evidence that those businesses that do understand the need to decarbonise are increasingly turning to voluntary carbon offsetting as they aim to reach net zero. However, voluntary carbon markets are not working properly, and offsets can mask insufficient efforts from firms to cut their own emissions, they often deliver less than claimed, and they may push out other environmental objectives in the rush to capture carbon.

3. 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?

Investment in green jobs and skills. It is encouraging that local government is now represented on the Green Jobs Delivery Group, having been left out of the previous Green Jobs Taskforce.

The Climate Change Committee has reviewed the evidence on the impact of voluntary carbon markets and offsetting. Their current shortcomings can be overcome with stronger governance to ensure high-integrity carbon credits and clearer guidance for businesses to encourage them to cut their own emissions first and foremost, before turning to offsets.

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

Expanding the capacity of local authorities to support businesses and communities to develop their net zero plans.

Complete its review of the UK's Green Finance Strategy to reflect important policy and legislative milestones over the last two years. That includes the Net Zero Strategy, the Environment Act, the Levelling Up and Regeneration Bill, and emerging work to update the National Adaptation Programme. Ensure that the UK Investment Bank can fund local action to decarbonise.

Fund energy efficiency measures and renewables as a long-term solution to improve energy security, reduce energy costs and grow the economy. Consistent policy and long-term funding are vital to growth as they give clear signals to markets and supply chains that it is worth investing in the assets and people they need to deliver green growth.

Address energy grid connection and capacity constraints which are a key barrier to electrification and are affecting inward investment.

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

Consistent policy and long-term funding to growing the scale at which action is taken, encourage markets and supply chains to invest in equipment and training (e.g. domestic retrofit), and reduce costs to consumers. Another policy area that requires policy and funding certainty is waste management: local authorities and the waste and recycling industry are still waiting for government action and guidance on the implementation of the Resources and Waste Strategy and the relevant parts of the Environment Act. Continued delays mean that investment decisions on new low carbon vehicles and facilities are being postponed, with negative economic and carbon impacts.

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

These two imperatives are not mutually exclusive and should not be seen as such. Investment in renewable energy including on-shore wind and additional solar generation will contribute to both our energy security needs and our climate targets.

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

Green growth offers huge opportunities for innovation and export. Local authorities should be resourced to support businesses invest in decarbonisation. In addition, local authorities' own decarbonisation plans mean that they are investing heavily in insulation, solar panels, electric

vehicles, low carbon buses. This boosts business growth throughout the supply chain including with numerous local tradespeople.

Questions for local government, communities and other organisations delivering net zero locally

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

Funding, particularly a long-term place-based approach to retrofitting existing homes and public buildings including schools and hospitals. Current grant funding can be very stop/start with unrealistic timescales for bidding and spending and little attention given to differing local circumstances. Invest in electric vehicle charging and digital infrastructure. Local authorities need secure, long-term funding for net zero programmes, without the need for places to compete against each other. Funding needs to be sufficient to cover the full range of statutory services that local authorities must provide; at present, LAs are forced to make difficult choices between supporting vulnerable children and adults and investing in place-based services. Government needs to understand that successful place-based services will support the growth and prosperity required to put people services on a more secure financial footing in the future.

The government should give more emphasis to supporting the low carbon economy through devolution deals and the Shared Prosperity Fund. Local authorities should be incentivised to make decarbonisation a central plank of their proposals. We are pleased to see that some of the latest County Deal bids contain proposals for green jobs and skills, decarbonisation support for businesses, and low carbon homes, transport and energy. For example, the York and North Yorkshire agreement signed in August 2022 has the ambition for the area to become England's first carbon negative region by 2040. This is a good example of how government can support and incentivise places to build on their natural and economic assets to help deliver net zero.

Recruitment and retention, skills and capacity. Like many other sectors, local government has major workforce challenges and skills shortages, particularly for new technologies. Local authorities are investing in training staff and building capacity.

Planning policy – the National Planning Policy Framework should require all new homes and buildings to be zero carbon as soon as possible and by 2025 at the latest. We also need other changes to national planning policy and design codes that will give far stronger emphasis to decarbonisation throughout. Energy efficiency standards for the private rented sector should be strengthened. Local authorities should be empowered to require the installation of energy efficiency measures when owners make change to their properties. Strengthen Local Transport Plan guidance to give greater priority to low carbon and active travel.

Clear baselining and measurement, so that local authorities have a consistent method that can be used for calculating emissions, setting targets and measuring progress towards meeting them. The UK takes a fragmented approach to carbon assessment, data and monitoring and evaluation generally. This can lead to a more superficial 'green washing' approach without really tackling Scope 3 impacts. Government should provide clearer leadership and guidance on what good looks like and make consistent baselining and assessment a requirement of their allocation of national and local revenue funding and capital investment programmes. This would make a significant difference.

Clarify policy and guidance on offsetting: in addition to improving guidance for businesses and regulating the voluntary offset market so that 'good' offsetting is seen as a last resort, government should provide clear guidance on offsetting and 'stacking' – how different funding regimes can be used together so that carbon credits and biodiversity credits under the Environment Act to support local decarbonisation, adaptation and nature restoration projects.

Improve the capacity and responsiveness of the electricity infrastructure by requiring distribution network operators to invest in grid improvements and respond quickly to new developments with low carbon facilities such as heat pumps and EV charge points. The challenge of rolling out EV charging infrastructure is a particular issue in large rural areas.

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

There are a number of sources where successful place-based case studies have been collected together including by the Local Government Association [here](#), the County Councils Network [here](#), and London Councils [here](#).

In particular, we urge the review team to consider the 40+ case studies published earlier this year by our Blueprint Coalition partners Friends of the Earth and Ashden [here](#). These include examples provided by ADEPT members including Cambridgeshire, Cornwall, Durham, Hull, Manchester, Reading, South Gloucestershire and Warrington.

Other ADEPT members will be submitting local case studies as part of their own evidence to the review team, these include Wiltshire (e.g. property decarbonisation and housing retrofit), Surrey (e.g. low carbon grants to SME businesses for energy efficiency and decarbonisation, solar panels for houses) and West Sussex (e.g. EV charge point network, solar farm and energy storage, heat decarbonisation plans for public buildings, and low carbon and green business support programme).

We welcome the financial support from the Department for Transport for a three year, £30m UK-wide programme looking for schemes that address the long-term decarbonisation of highways infrastructure and assets across local roads ([Live Labs 2](#)).

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

See comments under question 24 above. A more imaginative planning system with greater priority for zero/low carbon buildings, renewable energy and active travel would greatly support 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?

Tackle the barriers set out under question 24 above. Less competitive bidding for funding. Greater capacity and support for local authorities to access green finance.

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

The government should relaunch and revitalise the Local Net Zero Forum. It was helpful to see the commitment to establish this Forum included in the Net Zero Strategy (October 2021). ADEPT and our Coalition partners had advocated such a mechanism to improve engagement between national and local government senior officials. However, the Forum itself has only met twice in the past 12 months although some additional work has been done by task and finish groups. We would like to see the Forum operating with a much greater sense of purpose and urgency, to ensure that all relevant government departments make an active and senior level contribution, and to improve the transparency and communication of its work. As mentioned above, we believe that the local government representatives in the Forum could make a valuable contribution to the net zero review and would urge you to meet with them.

Next steps

We would value the opportunity to discuss the points raised in this submission and identify how we could work together to accelerate the delivery of net zero and green growth through integrated place-based programmes that will also contribute to achieving shared objectives in terms of environmental protection and improvement, levelling up, and health and wellbeing.

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