

An initial response to Greenwich council's Carbon Neutral Plan Evidence Base

These are some notes that may be useful to councillors and community groups, following the publication of the Evidence Base last week. An “initial engagement programme” is planned in April and May, and a public consultation at some time after June, which will give us all the opportunity to comment in more detail.

1. It is welcome that Greenwich council's Carbon Neutral Plan Evidence Base (hereafter, “Evidence Base”)¹ recognises climate change as a global emergency (paragraph 4.1) and that it recognises the growth of activism on climate issues and the “catastrophic consequences of inaction” (paragraph 4.2). But there is a serious danger that, by falling in line with the conservative and inadequate policies of the government and the Mayor of London, and by dressing up such policies as “low carbon”, the council will fail to address climate justice and social justice issues jointly, and will miss decarbonisation targets by a long way.

2. The borough has adopted all the main assumptions on climate policy by the government and the Mayor of London, despite these clearly being incompatible with effectively combating global warming. The Evidence Base is underpinned by a consultant's report² that sets out at length government climate policy, and the Mayor's policy, and does not once mention the ways in which these policies are incompatible with effectively combating global warming.

With respect to government, the Evidence Base refers (paragraph 4.4) to the Committee on Climate Change's recommendation that the government achieve carbon neutrality by 2050, and the adoption of this recommendation in the amendment to the Climate Change Act in June 2019. But it does not mention that (i) the CCC itself states that the government is on track to miss its own targets for 2023-27, let alone more ambitious targets;³ (ii) the CCC is warning of the “perilous” state of climate adaptation planning;⁴ and (iii) UK climate policy has been widely criticised, because the 2050 target falls far short of what is required globally, and ignores the UK's responsibility as a rich country that pioneered industrialisation, and because the UK continues to support and subsidise oil and gas production on the North Sea that is incompatible with effectively combating global warming.

With respect to the Mayor's climate policies, the consultant's report sets these out at length,⁵ but at no stage indicates that the borough may have to diverge from these policies in order to achieve decarbonisation. On the most politically contentious aspect of the Mayor's policy, the

¹ Downloadable from https://committees.royalgreenwich.gov.uk/Decisions/tabid/67/ctl/ViewCMIS_DdecisionDetails/mid/391/Id/e058a54e-9e46-4768-824c-4eedf001f6fd/Default.aspx

² Element Energy, *Development of the Greenwich Carbon Neutral Plan: The Evidence Base*. November 2019. See Appendix B at https://committees.royalgreenwich.gov.uk/Decisions/tabid/67/ctl/ViewCMIS_DdecisionDetails/mid/391/Id/e058a54e-9e46-4768-824c-4eedf001f6fd/Default.aspx

³ <https://www.theccc.org.uk/tackling-climate-change/reducing-carbon-emissions/how-the-uk-is-progressing/>

⁴ <https://www.theccc.org.uk/2019/12/18/2020-must-be-the-year-of-climate-action/> and <https://www.theccc.org.uk/2019/08/19/no-surprises-our-latest-adaptation-progress-report/>

⁵ Element Energy, *Development of the Greenwich Carbon Neutral Plan*, section 3.2, pages 25-31

construction of the Silvertown tunnel, the consultant's report repeats without comment traffic flow modelling by TfL, stating that "emissions across the area with the Silvertown tunnel in place will be similar to the level of emissions without the tunnel", and that "some roads will experience increased emissions whereas others will experience decreased emissions".

This passage alone throws doubt on the quality of the consultant's report. Firstly, because it makes no reference to the induced traffic effect, i.e. that building more road infrastructure increases the level of traffic. Secondly, because it uses the word "emissions" without making any distinction between the proposed tunnel's impact in terms of local air pollution or the impact in terms of global warming, thus repeating a deliberate obfuscation used constantly by the Mayor's office. Thirdly, because it ignores the well-grounded research that throws doubt on TfL's planning of the tunnel project.⁶

In short, neither the council nor its consultants have made any attempt independently to assess the value or otherwise of the climate policies of the government or the London Mayor. This sets a flawed framework for the council's own policies.

3. The estimate of greenhouse gas emissions in Greenwich used in the Evidence Base, of 860kt of carbon dioxide equivalent in 2015 (paragraph 4.28), misses out big parts of the picture, for no good reason. No methodology is perfect, but there are better ways of counting emissions than this. The method used by the Evidence Base excludes "embedded" greenhouse gas emissions (i.e. estimates of the amount of greenhouse gases emitted in the production of goods and services used in the borough), and "embedded" emissions from air flights taken by borough residents. The council's consultant's report explains that, if consumption-based emissions reporting (that includes estimates of these embedded emissions) were used, the total figures would probably be about 60% higher. It explains that the Scatter tool used by the Carbon Disclosure Project report (supported by BEIS, various local councils and the Tyndall Centre for Climate Change research), which produces figures including much of the "embedded" emissions, finds total emissions of about 1100kt of carbon dioxide equivalent in 2017.⁷

The decision about which methodology to use is political. If the council is really going to address global warming, in its policy decisions, lobbying work and interaction with other bodies, the whole picture – including "embedded" emissions of all kinds – needs constantly to be borne in mind. Otherwise the danger of "saving" emissions in one place, while increasing them in another place, can not be properly addressed.

4. With regard to the supply of electricity and heat to buildings, the largest source of greenhouse gas emissions in the borough, there are major gaps in the Evidence Base and proposals. The Evidence Base envisages retrofitting council homes and council buildings to higher energy efficiency standards (paragraph 4.30) and this is very welcome. But the much larger problems of the privately-owned housing stock in the borough, and its rapid expansion, is not addressed. The consultant's report includes no inventory, or even estimates or broad overview, of existing buildings and their sources of electricity and heat; neither does it include any estimates of the effect of new construction. It has not directly projected the number of new buildings, but has relied on heat demand projections in previous

⁶ Summarised e.g. in No Silvertown Tunnel press release, 20 January 2020

⁷ Element Energy, *Development of the Greenwich Carbon Neutral Plan*, pp. 44-45

models developed by the construction company Arup.⁸ Moreover, the council and its consultants have not properly evaluated the damaging impact on decarbonisation of national government policies on electricity and heat supply, and on building regulations, and ways in which these can be challenged and/or frustrated. This approach is fraught with dangers: that the projections used do not account for the impact of the new developments; and that the slow pace of electricity grid decarbonisation, which is largely outside the borough's control, may result in it missing its climate targets by a long way. Should the council not also examine the potential for integrated electricity and heat networks, with multiple decentralised sources, predominantly solar and heat pumps, that are widely considered to be the best suited to effectively combating global warming?

5. The Evidence Base proposes to phase out use of fossil fuel power for heat networks (e.g. gas fired Combined Heat and Power plants) by 2030 (paragraph 4.31), and this is very welcome. But it is not clear how this policy is compatible with the current widespread use of, and support for, gas-fired heating projects. The council should make sure there is no confusion and greenwash around district heating schemes and their role in reducing greenhouse gas emissions. The Evidence Base proposes substantial investment in district heating schemes (paragraph 4.31), but does not comment on how the use of fossil fuels will be phased out. While combined heat and power technologies, which have been in widespread use since the 1970s, are more energy efficient than conventional power stations that release the heat in to the atmosphere, they are usually powered by gas. The Pinnacle Energy network on Greenwich Peninsula, pointed to by the council as an example of technology that can “help reduce GHG emissions”,⁹ is far behind what is needed: the main fuel is gas. How will this, and similar, gas-fired networks be phased out by 2030? A first step, surely, is to press for a strategy for this major infrastructure shift nationally. A second step must surely be to make an inventory of projects in the borough, and project steps towards decarbonisation. A third step could be to examine the potential locally of technologies such as use of waste heat from transport, heat pumps, etc.

6. The Evidence Base says that a future ban on gas boilers should be signalled e.g. by 2021. This is welcome. But this is not really an issue of council policy, as the government has already signalled that such a ban will be put in place in 2025.¹⁰

7. The Evidence Base commits the council to a “partnership approach”. Will this include cooperating with, on strategic planning (and not merely implementation of existing schemes), community energy organisations such as the South East London Community Energy?

8. With regard to transport, the second-largest source of greenhouse gas emissions in the borough, the Evidence Base envisages an expansion of cycling and walking infrastructure (paragraph 4.34) and this is very welcome. But the modest scale of the borough's plans (costed at £30-50 million) is overshadowed by the massive investment in the Silvertown tunnel (costed at £1 billion). Why has the borough not looked at the

⁸ Element Energy, *Development of the Greenwich Carbon Neutral Plan*, p. 51

⁹ *Greener Greenwich Strategy*, p. 9

¹⁰ <https://www.bbc.co.uk/news/science-environment-47559920>

policy and spending implications of scrapping the Silvertown tunnel and using freed-up resources to support cycling, walking and public transport? This could then guide council policy towards a rational position on the tunnel, i.e. to urge the Mayor to cancel the project.

9. The Evidence Base says that the borough will “support and encourage an accelerated uptake of zero emission vehicles (ZEVs)” (paragraph 4.35) – but does not explain that using these vehicles may not reduce greenhouse gas emissions at all. The borough’s consultants categorise battery electric vehicles and hydrogen fuel cell electric vehicles as ZEVs, and say that “when coupled with low carbon electricity or hydrogen sources, they enable deep decarbonisation of the transport sector”.¹¹ In reality, much of the UK’s electricity will continue to be produced from gas for many years to come; a large fleet of electric cars would comprise a new source of electricity demand, thus further delaying the decarbonisation of electricity generation; the construction of the cars themselves, and infrastructure for them, is all highly fossil-fuel intensive; and there are as yet no proven methods of producing hydrogen at scale in an economically feasible way. This is why policies to tackle climate change must focus, with regard to urban transport, on reducing drastically the number of cars and trucks on the roads, rather than supporting electric vehicles. This should be the bedrock of the council’s approach.

10. The Evidence Base includes just one mention of public transport (paragraph 4.36), in the context of a shift away from private car use. But why are more ambitious plans for public transport not considered? Why are opportunities for cheap or free public transport not considered? Instead of supporting cars, including electric cars – which have the entire wealth and power of the motor manufacturing industry behind them already – the council should shift all available resources to public transport and infrastructure for genuinely zero-carbon transport, and join with other councils in seeking more ambitious planning from TfL.

11. There is no mention in the Evidence Base of any plans to compare the efficacy of different measures. There will always be choices to be made about what is most effective, and what can resist most effectively the pressures from government and corporations in support of the fossil-fuelled economy. The only comparison made in the Evidence Base is of the impact of tree planting with the impact of reducing the number of cars (paragraph 4.48), in the context of a gratuitous dismissal of tree planting as “insignificant” for greenhouse gas reduction. An estimate is given, without any source or reference, that planting trees on an area the size of Blackheath would be equivalent to taking 156 cars off the roads. But, first, the assumptions made in such comparisons, and their limitations, should always be mentioned. Second, if the council has the capacity to make such comparisons, they should be made for the most significant items. What is the effect of a widespread, borough-wide tree planting policy (that is more likely in reality than planting trees on Blackheath), compared to planting trees on Blackheath? What is the effect of the property developments currently under construction, compared to the baseline? What is the effect of the Silvertown tunnel, compared to the baseline? What is the effect of reducing the number of cars, compared to supporting electric cars? What is the effect of closing streets to traffic and a more ambitious cycling policy, compared to the baseline? and so on.

¹¹ Element Energy, *Development of the Greenwich Carbon Neutral Plan*, pp. 16-17

12. Thought needs to be given to combining the fights for climate justice and social justice, but there is little indication in the Evidence Base that this is being done. It states (paragraph 4.9) that action to reduce carbon emissions supports the borough’s other objectives including to “improve health, safety, homes, air quality and prosperity for all”. But the specific measures mentioned in the evidence base fall far short of this. A housing strategy is needed that will both cut fossil fuel use and address homelessness and poor-quality housing. A transport strategy is needed that will both cut fossil fuel use and expand, and slash the cost to users of, public transport. If the council really hopes to move along this path, it could start by changing its relationship with community groups and social movements in the borough; opposing fossil-fuel-focused infrastructure projects such as the Silvertown tunnel; focusing transport policy on public transport, cycling and walking; and shifting the focus in buildings policy away from resource-heavy privately-built, privately-owned flats towards social housing.

13. The Evidence Base refers to a “publicity and engagement campaign that targets all key stakeholders”. Is this going to include active engagement with community groups? The council’s record of such engagement is mixed. For example last year well-attended public events were held, in February by Speak Out Woolwich and in June by Extinction Rebellion Greenwich, where issues of climate policy and social policy were considered. Documentation from both these events was made available to the council.¹² It does not appear that much notice has been taken so far of the very constructive suggestions, thought through and worked on by residents who attended both these events.

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¹² Speak Out Woolwich Community Conference Report 2019, at <https://speakoutwoolwich.org.uk/reports/>;
Extinction Rebellion brochure, *What the Royal Borough of Greenwich Could Do About the Climate and Ecological Emergency*, June 2019, sent by email to all councillors