

Comments on the Greenwich Carbon Neutral Plan 2021-2030

Response to the consultation by Simon Pirani (Greenwich resident and energy researcher)

1. “Carbon neutrality”

The Greenwich Carbon Neutral Plan is so called thanks to the council resolution, passed in June 2019, that the borough become “carbon neutral” by 2030. “Neutrality” usually means that the greenhouse gas emissions from a country or area are no more than the total of emissions (a) removed from the atmosphere by negative emissions technologies or (b) for which offsets have been bought.

The plan states (page 7) that “the potential for removing CO₂ from the atmosphere is likely to be limited and costly”. I would go further and submit that there is as yet no evidence that carbon removal technologies could or should play any part in reducing emissions.

The plan also states (page 7) that “offsetting is not a sustainable strategy in the long term as emissions would need to be cut globally”. I submit that it is not a sustainable strategy in the short term either, given that emissions need to be reduced, in Greenwich as elsewhere, very rapidly.

However, without offsets and carbon removals, the idea of “carbon neutral” – as opposed to “zero carbon”, i.e. aiming simply to reduce carbon emissions to zero – makes no sense. I submit that it would be less confusing if the council re-framed its targets in terms of “zero carbon”. This would help in presenting publicly the success or failure of different policies, the importance of which the plan recognises.

Suggestion. Start a public debate about the name being changed to “zero carbon plan”.

2. Carbon budgets

It is very welcome that the plan (page 31) points to the estimate by the Tyndall Centre for Climate Change Research that reductions need to be at a rate around 12.5% per year, if Greenwich is to make an equitable contribution to global emissions reductions, as the plan recognises. I also welcome the acknowledgment (page 13) that the actions set out in the Carbon Neutral Plan “do not go far enough” to make Greenwich “carbon neutral” – let alone zero carbon – by 2030.

It is very important that the borough should find ways to measure its progress, compare with other boroughs, exchange experiences, and access the results of research on emissions reduction.

Suggestion. The borough should use the [Scatter tool](#), developed by the Tyndall Centre and local authorities in Greater Manchester and Nottingham, for this purpose.

The rate of emissions reduction implied by the Tyndall Centre’s research is more rapid than the rate of reduction implied by the carbon budgets – i.e. the amounts of carbon that may be used without breaching emissions reduction targets – used by the UK Climate Change Committee and the government. ([Recent research](#) by scientists at Tyndall and Lund University found that the carbon budgets used by the UK government are at least twice as big as those that are informed by climate research and by the targets set out in the 2015 Paris agreements.)

Suggestion. Given the borough’s laudable intention of moving faster than the government targets imply, the plan document should explain this distinction clearly.

Implementing ambitious targets will require great changes not only in council policies but in the way that the economy works and the way we all go about our daily lives. Knowledge of the research on these changes, in the council and in communities, will help.

Suggestion. The borough should encourage study of research on emissions reduction developed for the UK, e.g. by the [Centre for Research into Energy Demand](#) (based at the University of Oxford); research on resource efficiency on the [Absolute Zero project](#) (based at the University of Cambridge).

3. The Carbon Neutral Plan and social justice aims

The plan says that in the medium term it will “maximise the impact from carbon reduction measures for business, employment and the local economy”, including developing “a job creation scheme providing training/ apprenticeships to support the Low Carbon Advice service/ retrofit programme” (page 25).

Such suggestions are welcome, but far from adequate, given the hardships that communities face after years of austerity policies and the coronavirus pandemic.

It is quite possible that later this year, as the support measures introduced during the pandemic are withdrawn, communities in Greenwich will be faced with even greater levels of hardship than in recent years, including poverty, unemployment and poor housing – while the council’s ability to provide welfare services has been damaged by years of cuts.

In such a situation we should seek ways for the council and communities to work together, to find ways of combining progress on decarbonisation with measures that achieve social justice and resist government austerity policies.

Suggestion. The council could initiate a wide public discussion on these pressing issues, by means of public events and the use of social media.

4. Transport emissions and the Silvertown Tunnel

The plan sets out ambitious aims for reducing emissions from the transport sector, the second-largest source of emissions in the borough: “a shift away from car travel to walking, cycling and public transport” (page 20), which means that the vehicle-kilometres travelled in the borough by car “must decrease by 45% compared to 2015” and vehicle-km travelled by vans and trucks “must decrease by 10% compared to the baseline” (page 29). The plan further points out that “active travel”, i.e. walking and cycling, and decreasing car use, “has public health benefits” (page 13).

All these targets are incompatible with the largest infrastructure project planned in the borough, the Silvertown tunnel, to run across the Thames a few metres east of the Blackwall Tunnel. The £2 billion project is managed and ultimately funded by the Greater London Authority (GLA), rather than Greenwich, but if built it would inevitably lead to an *increase* in traffic volumes and carbon emissions. (For detail see the [Stop Digging report](#) published by the Transport Action Network.) It would suck human and financial capacity away from zero-carbon transport projects and make it impossible to attain the targets presented. Conversely, cancellation of the tunnel project could be part of a concerted effort to reduce traffic volumes.

Whereas Newham, Hackney, Lewisham and Southwark councils have opposed the tunnel project, Greenwich has stubbornly supported it. Neither the borough’s declaration of a “climate emergency”, nor the coronavirus pandemic and the uncertainty implied for long-term traffic projections, have caused the council to re-think.

Suggestion. The full council should urgently debate the Silvertown tunnel project, and urge the Mayor of London to cancel it. Without such a decision, it will be impossible to reach the targets in the plan for decarbonising transport, let alone targets implied by climate science.

The plan says (page 20) that carbon emissions will be reduced by a “rapidly increased uptake of zero emissions vehicles such as battery electric cars”. This incorrectly gives the impression that battery electric cars do not emit greenhouse gases. Life cycle emissions studies of electric cars (summarised [here](#) by Carbon Brief) suggest that, when driven in the UK, their emissions per kilometre driven are about half that of a petrol or diesel car. They could become more efficient than that, although still not zero-emission, through decarbonisation of the electricity network. But describing them as “zero emission” can give the wrong impression, that a shift to electric vehicles would solve the problem of carbon emissions in transport.

Suggestion. The term “zero emission” should not be misused to describe battery electric vehicles or other technologies that emit greenhouse gases. This is important in order to convey the realities of the challenges we face.

5. The political damage done by the Silvertown tunnel project

In order to provide political support for the Silvertown tunnel project, the council has corroded local democracy. There has never been a debate in full council about the project, despite its importance for the borough’s transport system. When called upon to explain the council’s support for it, councillors have remained silent or fallen back on evasions and untruths. For example, at the largest public meeting in the borough to discuss the tunnel, organised by Speak Out Woolwich in July 2019, councillor Morrow, the only councillor present supporting the tunnel, claimed incorrectly that the project would mainly benefit low-income families. In fact it would benefit business and better-off drivers at lower-income families’ expense.

The council has shown contempt for residents, by staying silent about its reasons for supporting the tunnel and resorting to untruths about procedure. In a public question to Danny Thorpe, the leader of the council, in September 2020, I asked whether the council should not reconsider its support for the project, given the climate emergency and the Covid-19 pandemic. Councillor Sizwe James answered, incorrectly, that “there is no legal avenue for the council to oppose the tunnel at this stage”. This made no sense: the council could do e.g. what Abena Oppong-Asare MP, Matthew Pennycook MP and Lyn Brown MP have done, entirely legally: call on the Mayor urgently to review the project.

Controversy over the tunnel has also damaged democracy within the Labour party, which controls the council. Instead of encouraging open discussion on the pros and cons, some party officials have used threats of disciplinary action to silence those who have doubts about this massive spending decision.

If the council continues its support for the tunnel, and it is built, there would be a high price to pay in political terms. Residents would know that the Mayor of London went ahead with the project despite having no social licence; despite local residents who are aware of it being opposed to it; despite climate scientists and transport researchers advising that it is incompatible with climate and air pollution aims; despite doctors, teachers and numerous Labour party MPs and organisations opposing it. Residents would also know that the council supported the Mayor in this cynical, climate-wrecking venture. How would the council then “engage the community [...] on climate change and promote behaviour change initiatives”, as the plan states (page 25)? Why would residents listen to anything the council has to say about

the climate emergency, if it continues to support the tunnel project, so damaging for decarbonisation and air pollution policies, and does not even explain why?

Suggestion. In addition to urging the Mayor of London to cancel the tunnel project, the council should initiate a long-overdue, wide-ranging public consultation on it, and on alternative transport policies that support decarbonisation aims, and relay the results of that to the Mayor.

6. Buildings, heating and heat networks

In the section of the plan on Monitoring progress (page 29), very ambitious plans for buildings and heat networks, the largest source of emissions in the borough, are mentioned: entirely phasing out fossil fuel for heat networks by 2030, phasing out gas boilers by 2030 and installing heat pumps in 90,000 homes and hybrid pumps in 20,000 homes. But it is not clear what measures will be taken to move towards these targets. The plan says only that the council is “pursuing communal heat projects” and energy efficiency improvements (page 18); and that it aims to commission a Feasibility Study with the aim of phasing out the use of gas-fired Combined Heat and Power plants (page 22). There is also an apparent contradiction: the plan refers approvingly (page 19) to “several local energy networks”, including those on the Peninsula – although the largest network on the Peninsula (the Pinnacle Energy project) is fuelled by gas.

In order to undertake this transition, obviously an inventory, or some estimates or broad overview, of existing buildings and their sources of electricity and heat, are needed. There does not seem to have been any progress on this since the publication of the Evidence Base for the Carbon Neutral Plan, and the consultants’ report that accompanied it, in January 2020. It is also obvious that the council will face major obstacles in the shape of central government policy and the accumulated effect of a decade and more of “austerity”.

Suggestion. An overview of the problem of decarbonising buildings and heating should be drawn up and published. This should include an assessment of the problems posed by central government policy, and what can be done by the council, and civil society, about these.

7. New buildings

The plan states that recent new social housing projects were “delivered to a zero carbon standard” (page 19). But there is no information in the plan, or on the Greenwich borough web site (as far as I could see), about how this standard is measured. The plan also states that new build in “recent years” “achieved a reduction of 46% on average in comparison to building regulations-compliant buildings in the financial year 2019/20”. It is impossible to understand from this statement what has been achieved. What is the reduction of? How did the buildings regulations-compliant buildings in 2019/20 do in terms of carbon emissions?

Suggestion. Instead of publishing unclear comparisons, the borough should adopt meaningful measurements of the carbon emissions of buildings, and work towards them. For example, the recent Architects Climate Action Network report, [The Carbon Footprint of Construction](#), recommends adopting the [Royal Institute of Chartered Surveyors “Whole Life Carbon Assessment for the Built Environment”](#) as a nationally agreed methodology. Greenwich should work with architects, and with other local authorities, to adopt this or some other suitable methodology.

The plan states that Greenwich intends to achieve “a zero carbon standard in new Affordable Housing” (page 19). But Affordable Housing only comprises a small proportion of the

additional 30,000 homes that the borough expects will be built between now and 2030. What standards will be applied to the rest? The danger is that the effect of emissions reduction measures in Affordable Housing could be counteracted by emissions from other housing.

Suggestion. That the borough, while joining with other local authorities to call on central government to impose stricter building regulations, also immediately adopts the [New London Plan Policy SI2](#), as a starting point for suppressing carbon emissions from new buildings.

8. Implementation of the plan

Decarbonisation on the scale envisaged requires wide-ranging change. The danger of progress in one area being cancelled out by failure elsewhere must be kept in mind; this requires coordination. For these reasons, a proposal that a senior council official should coordinate efforts on climate and ecological issues, and arrange a single point of contact for residents who are concerned about the climate emergency, was included in a document published in May 2019 by Extinction Rebellion Greenwich (XRG), [What the Royal Borough of Greenwich Could Do About the Climate and Ecological Emergency](#).

This proposal, and others, was put to Danny Thorpe, leader of the council, at a meeting in June 2019, and discussed a few days later at the XRG People's Assembly on Climate Change at the University of Greenwich, to my knowledge the largest public event at which climate action in Greenwich has been discussed.

This suggestion was turned down. Cllr Thorpe said that no such senior position would be created. Instead, the Air Quality Task Force could be turned into a Climate Task Force, and that the responsible officer would be the Director of Regeneration, Enterprise and Skills.

In my view, to add the coordination of action on climate change to the responsibilities of that Director, rather than to have a person employed with the power to coordinate efforts across the council and take a holistic view, could result in inaction and failure. Long-term, difficult changes related to decarbonisation could be constantly superseded by immediate problems for which the Director is responsible.

The plan says (page 11) that the council's "organisational capacity to address the emissions under its direct control will be built up". But how will the council's measures be coordinated by measures to address emissions not under its direct control? And without an officer with the power to coordinate actions across the council, how will it act effectively with respect even to its own emissions?

Suggestion. Reconsider the idea of appointing a senior council officer to co-ordinate efforts on climate and ecological issues.

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Note. In January 2020 I sent to all councillors [some comments](#) on the borough's Carbon Neutral Evidence Base, which preceded the Carbon Neutral Plan. I received no acknowledgment or response. The plan (page 25) says the council now intends to "engage the community". Let's hope that that now includes responding to correspondence.