

Response to Greenwich Council's Draft Carbon Neutral Plan

Greenwich and Bexley Green Party – March 2020

6th March 2021

Dear Cllr. Thorpe and Cllr. James,

Greenwich and Bexley Green Party commend the publication of the draft Carbon Neutral Plan by the Royal Borough of Greenwich Council and invitation to provide feedback.

However, this draft plan falls very short of the maximum ambition scenario described in the evidence base document prepared in 2019, which described a wide range of concrete short-term actions that can significantly contribute to the mitigation of the climate change and biodiversity emergency that humanity finds itself in.

On the basis of objective and rational scientific evidence, the council has declared that there is a climate emergency. The rapid change in the habitable climate of human beings is a matter of life and death for many in the world. The brunt of responsibility for mitigation must be borne by high-emitting, wealthy nations. The local impacts are barely less significant and will entail loss and harm that is personally catastrophic to Greenwich residents and communities.

Avoiding the disastrous outcomes that science predicts requires colossal action in a frighteningly short time. Asking people to fight a nearly invisible enemy that is sneaking up on it with great speed is the most formidable political challenge in history – and it must be aggressively championed in every action at every level of government from the very top to the very bottom. This draft plan must be thoroughly improved in terms of action and urgency to bring about the changes to which the council is formally committed.

We remain ready and willing to put our expertise and community connections at the disposal of the council in service of bringing about radical action.

Following are more detailed comments relating specifically to each of the areas contained within the draft plan.

We hope that our comments are received constructively and urgently used to improve the plan from its current state.

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Introduction

1. The following remarks relate to the Royal Greenwich Draft Greenwich Carbon Neutral Plan (henceforth “CNP”) available from the Royal Borough of Greenwich (henceforth “the council”) website under the title “[The Royal Greenwich draft carbon neutral plan has been published](#)”.
2. Greenwich and Bexley Green Party (henceforth “GBGP”) acknowledges the use of the independently-produced report from November 2019 entitled “Development of the Greenwich Carbon Neutral Plan: The Evidence Base” (henceforth “the evidence base”) as the principal input into the CNP.
3. GBGP makes its observations in this response principally from the standpoints contained within the evidence base, since while it is sometimes unduly conservative in its assessments, it is nevertheless broadly directionally correct. We do not fully accept every assertion and assumption within the evidence base and reserve the right to maintain specific objections with respect to some points. (As an example, please refer to the critiques raised by Simon Pirani in [his response to the evidence base](#)¹ which the council has already received.)
4. GBGP agrees with Cllr. Thorpe in the Foreword with the description of both the Covid-19 crisis and climate change disproportionately creating negative impacts on our elderly, vulnerable and poorer residents, which all the more adds to the urgency of addressing the challenge of meeting the carbon neutral by 2030 target declared by the council.

Section 1: General remarks

Vision

1. Given the limited ambition described within the CNP, it is disingenuous to claim that it “sets us on the path to become carbon neutral by 2030” (p3) when evidence base states clearly that “in order to reach carbon neutral status by 2030, RBG must align its policies with the ‘Maximum ambition’ scenario, implementing many or all the highest ambition policies we have set out in order to decarbonise ahead of national trends” (section 1.4).
2. GBGP asserts that there is no plausible way under which this modest three year plan can be executed – taking us to 2024 – and still have time to pivot into a strategy which accomplishes net zero. Moreover, the CNP contains no such commitment and defers to a vague promise of a review based on the emerging national and international situation.
3. The CNP notes that the world-renowned Tyndall Centre’s report on Greenwich making a ‘fair’ contribution to the Paris Climate Change Agreement involves restricting CO₂ emissions to a maximum cumulative budget of 5.3m tonnes for the period 2020-2100, and that this will be exceeded in 2027 under its baseline scenario (p.31). The CNP as formulated will deliver – at best – as an incrementally improved version of the baseline

¹ Pirani, S. (2020) *An initial response to Greenwich council’s Carbon Neutral Plan Evidence Base*. Accessed at <https://piraniarchive.files.wordpress.com/2020/01/greenwich-carbon-neutral-comments.pdf>

scenarios of the Tyndall Centre report and the evidence base, which is nowhere close to enough to avoid disastrous outcomes.

4. The CNP lacks urgency throughout. Many of the “immediate actions” within the CNP have a definition of immediate that the general public will not recognise, often failing to take action even within a year. For example, introducing collection charges for contaminated recycling bins in 2023 is described as an “immediate action”. The lack of urgency manifests in other ways, too. For example, there is no mention whatsoever of a ban on new CHP gas boilers from 2021 as recommended in the evidence base.
5. Overall, the CNP can best be described as wholly inadequate given the scale of the climate and biodiversity emergency that we face, particularly with respect to the ambition and urgency of its commitments.

Financing

6. GBGP notes with regret the repeated references in the CNP to funding gaps and lack of wherewithal to finance radical action on carbon neutrality. We are not oblivious to the constrained budgets under which local authorities are required to operate.
7. As a matter of consequence from the assumption of unavailability of funds, the CNP embraces a “bang for buck” logic that seeks the highest efficacy intervention given the constraint of limited expenditure. GBGP rejects this logic. The Covid-19 crisis has demonstrated viscerally the difference that an “at all costs” approach to intervention can make in terms of effectiveness when it is a crucial matter of life and death.
8. GBGP asserts that addressing the climate and biodiversity crisis is even more a matter of life and death than the Covid-19 crisis.
9. If the Chancellor of the Conservative Party can find £350bn to salve the economy for just one year under the pressure of the coronavirus crisis, and our country can find the wherewithal to establish such a great and effective institution as the NHS under conditions of having being bankrupted and materially ruined by the Second World War, it must not be beyond the wit of politicians to devise an approach that can marshal capital resources for an investment upon which our material and spiritual wellbeing entirely depends.
10. GBGP encourages the council to pursue more imaginative options with respect to financing, whether with regional and central government support or not. If the council does not have additional funds available on hand, it must nevertheless endeavour to overcome this constraint. A full socio-economic appraisal notwithstanding, access to capital for investment is among the redeeming qualities of capitalism. The actions required by the council can be modelled as investments with payoffs in terms of future costs avoided and revenues generated to better attract financial capital to these opportunities.
11. Among the more creative options for raising money for investment, the council could consider issuing financial instruments to borrow the investment directly from residents (“Greenwich bonds”). It could explore issuing local currency or cryptocurrency for residents to spend on energy efficiency improvements and expedite popular acceptance of the currency as a means of exchange by accepting it in lieu of council bills and

services. It could institute a Tradable Energy Quotas (TEQs) scheme and require that TEQs are paid in exchange for the embodied energy of local services alongside fiat currency, while also raising revenue by selling additional TEQs directly to the wealthy and high-consuming. It could look at raising revenues through increased road pricing, particularly at pinch points such as the Blackwall Tunnel. It could establish a local lottery that could be managed with a profit margin built in. It could launch a new social enterprise for managing climate works, in a similar way to having launched GLL for leisure centres and library management. It could try to attract an increased share of corporate social responsibility budget from large businesses situated in the borough. These suggestions are all additional to traditional grant-based financing such as the Mayor of London's £500m Energy Efficiency Fund which can be drawn upon.² We are not professional financiers and do not have all the answers, but at the very least, the council should take advantage of its proximity to the home of world finance and find out what is possible in terms of raising capital for investment.

12. GBGP notes that even in the maximum ambition pathway in the evidence base, the borough's net emissions amount to 95 kilotonnes (kt) CO₂ per year in 2030, which, according to carbonfootprint.com, the cost of offsetting via UK-based projects is estimated at £12.2m per year. Cheaper options are available but they are not usually certified and generally discredited on the grounds of not reaching the gold standard of representing "real, additional, verifiable and permanent emission reductions".³ This carbon gap and financial outlay associated with offsetting is not mentioned or explained anywhere in the CNP. It hardly needs to be added that the CNP does not remotely approach the 'maximum ambition' levels of decarbonisation.
13. GBGP notes that under a close-to-baseline scenario, if the council were to try to "buy its way to net zero", the costs would be in the order of hundreds of millions of pounds per year and provide very little benefit for the local area. GBGP would find any such approach to try to outsource the majority of emissions reduction while undertaking minimal effort to reduce emissions within the borough as entirely illegitimate.

Community engagement

14. GBGP notes that the mechanism of engagement for feedback on the CNP heavily restricts the freedom that residents have to make observations. There are very limited options to comment and often the comments solicited frame the choices in a way that is not constructive.
15. GBGP regrets that the local community groups with which we are associated have not been called upon to be involved in the council's drafting of the plan.
16. The evidence base calls for a major publicity campaign covering all aspects of the carbon neutral plan. Practically speaking, this should involve every household and community hearing the message day in, day out. Covid-19 communications have provided a model. Using schools as a point for teaching carbon literacy is an excellent

² Evidence base, p. 37

³ Evidence base, p. 38

first step, but under a timeline where action is required urgently and immediately this alone is terribly inadequate.

Skills gaps

17. The CNP makes little reference to training and skills gaps, assuming that the private sector is able to take the strain of training glaziers, plumbers, carpenters, solar installers and other tradespeople through apprenticeships. There is every chance that a severe skills shortage will affect these professions as the transformational capital investment to a carbon neutral society is made. In such situations, the smart management practice is to build capacity in advance of anticipated demand.
18. The council must proactively hire for and sponsor a rapid expansion of trained professionals for services we will surely need, such as double glazing installation, replacing gas boilers with heat pumps, installing electric vehicle charging points, adding loft and cavity insulation, etc. A skills shortage is entirely foreseeable and must be avoided.

Target specificity

19. GBGP calls out the lack of specificity in the targets, which are framed as percentage reductions without reference to what percentage is being affected. These ought to be nailed down and baselined as reductions on the absolute levels (rather than per capita levels) in the last available year of reliable data in the period 2015-2020.

Governance

20. GBGP calls for an Environmental Safeguarding Committee to be assembled within the council with the remit of applying scrutiny from the perspective of achieving carbon neutrality and increased biodiversity in the review of all major projects across the council's portfolio. This should be cross-party in composition and able to call expert witnesses as required.

Section 2: Specific feedback

21. The following section relates to the areas in the CNP as defined implicitly by the council in dividing up the overview of actions in section 4.

Buildings

22. The UK has the least energy efficient housing in Europe.⁴ GBGP notes that only 36-38% of residential housing falls into Energy Efficiency Rating (EER) bands A to C.⁵ The evidence base recommends bringing up all homes in Greenwich to this level and we thoroughly endorse this call.
23. GBGP acknowledges the pilot work done to conduct “deep energy retrofit” on two council estates. The evidence base states in section 3.2.8 that the works included “installing wall insulation, window refurbishment/replacement, and energy saving lighting”. While improvements will surely have been achieved, it is unlikely to have had the desired magnitude of effect. These existing techniques in retrofitting housing for warmth are only modestly effective but are also labour-intensive (and therefore expensive) and do not make a big enough dent in housing emissions to meet the stated targets. We therefore encourage the council to explore opportunities for partnership with providers of the Energiesprong (“Energy Leap”) model of whole home retrofit pioneered in the Netherlands and embrace the evidence base’s recommendation of sponsoring a Greenwich Home Improvement Agency (HIA, p.33) to foster the introduction of this technique to the borough.⁶
24. GBGP calls for London Council’s Big London Energy Switch to exclusively offer deals from suppliers which do not use coal, oil, natural gas, or wood pellets in their energy mix.⁷
25. A one-way crank on improving rental standards for energy efficiency is an excellent leverage point to both improve the energy efficiency of buildings and the average living conditions of private tenants. GBGP notes the intention to increase enforcement of such standards and encourages maximum ambition in achieving energy efficiency across the entire housing stock. With respect to the risk that costs are passed onto renters, which would further antagonise the already dire housing situation for renters in the borough, GBGP advocates exploring the option of reimposition of rent controls in the borough. Closing this “get out clause” for landlords should be among the big asks of government or London authority. It hardly needs mentioning that this is longstanding Green Party policy and a charter for increased renters’ rights shall be implemented under Siân Berry’s administration should she win the election for Mayor of London in May 2021.
26. GBGP regrets the omission of a positive story around reduction of household and commercial heating bills with respect to building improvements. We note that the evidence base does not take predictions on the changes of weather into the anticipated change of demand for services going into the future. Climate change means more

⁴ Green Alliance. (2020). *Reinventing Retrofit: How to scale up home energy efficiency in the UK*. Accessed at https://www.green-alliance.org.uk/resources/reinventing_retrofit.pdf

⁵ Ministry of Housing, Communities and Local Government (2020) *English Housing Survey: Headline Report*. Accessed at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf

⁶ Evidence base, p.33

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https://www.royalgreenwich.gov.uk/info/200247/housing-related_benefits/1362/the_big_london_energy_switch

extremes of weather and will likely result in increased variability of extreme weather patterns, including spells of more extreme heat and extreme cold than the borough has been habituated to over the past decades. This will drive demand for both heating and air conditioning. The return on investment in reducing energy loss from homes and the installation of two-way heat pumps (capable of heating and cooling) is likely underestimated.

New development

27. GBGP notes that the leverage point in achieving energy efficiency in heating and cooling homes, as well as installing micro-electric generation such as solar power, is in the design phase of construction. We recognise and agree with the council's acknowledgement in the CNP that "new builds not built to a zero-carbon standard will ultimately require more costly retrofitted measures". A good standard already exists for this, namely, the Passivhaus standard, and all new planned construction in the borough should be certified through a registered Passivhaus certifier for compliance with this standard.⁸ Passivhaus buildings achieve a 75% reduction in space heating requirements, compared to standard practice for UK new builds. The council should be required to publish auditable information with respect to compliance to this standard as recommended in the evidence base (p. 34).
28. GBGP regrets the tentative and halting prior efforts of the council to establish district heating systems with new build construction, some of which were partially installed but remain non-operational. District heating in itself reduces emissions modestly, but to realise transformative gains then the heat in the networks must be provided from zero carbon sources. This will necessarily be from zero carbon electricity. Integrating heat pumps into district heating offers large CO₂ emissions reduction potential.⁹ therefore call for concrete commitment to no new builds without district heating integrating heat pumps as an enshrined principle going forward. The integration of heat pumps in district heating is relatively new within the UK but there is a wealth of knowledge in continental Europe that may be tapped using the right partnership approach.

Transport

29. GBGP applauds the ambition in the CNP regarding reduction of motor traffic use in the borough to reduce emissions from the transport sector, which is the second-largest source of emissions in Greenwich.
30. The references to battery-powered electric cars as "low emissions vehicles" ignores their cradle-to-grave lifecycle emissions (including 9 tons CO₂ in manufacture alone) and the

⁸ https://www.passivhaus.org.uk/what_is_passivhaus.php#2 Passivhaus specifies performance targets in kilowatt-hours (kWh) per year for energy used in heating, cooling and primary energy per metre squared.

⁹ Department of Energy and Climate Change (2016) *Heat Pumps in District Heating*. Accessed at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/502500/DECC_Heat_Pumps_in_District_Heating_-_Final_report.pdf

fact that they are powered from electricity from the grid which also contributes to carbon emissions until energy supply is derived solely from zero carbon sources.

31. On this basis, GBGP rejects widespread adoption of electric cars as a solution to radical emissions reductions within the borough. Car and van travel must be substituted by train, light rail, electric bus, cycle and walking journeys.
32. GBGP reiterates its opposition to the construction of the Silvertown Tunnel, which is considered “as good as built” in the CNP (p. 21). Silvertown Tunnel will double the cross-river capacity from 100,000 motor vehicle journeys a day to 200,000 motor vehicle journeys a day. It will induce traffic to the borough through various means, including the incentive of dedicated HGV lanes for large vehicles and incentivising through-city travel as a shorter route than travel on the M25 via Dartford (which was built specifically to keep traffic out of our residential suburbs). Construction of the Silvertown Tunnel is contrary to every declared ambition in the CNP and its cancellation must be called for by the council immediately.
33. The council should raise its ambition to sponsor new transport modes, such as facilitating the extension of bike-for-hire services and increasing the security and availability of cycle parking. The travel plan must also support the incipient market of electric cargo bicycles by radically extending segregated cycle lanes as described in section 3.1.2 of the evidence base.
34. For vehicle-km traveled by car to decrease by 45% compared to 2015 and vehicle-km travelled by vans and trucks to decrease by 10% compared to the baseline, a reduction in overall road space dedicated principally to motor vehicle transport is required. This includes removing roads, which generates the effect of traffic evaporation.¹⁰
35. The council must accelerate and raise its ambition with respect to its existing cycle superhighway extensions with the goal of making it safe and convenient to ride and park a bicycle anywhere in the borough.
36. GBGP regrets the omission of “key asks” relating to the better integration of Greenwich’s transport system with the rest of the network managed by TfL. Currently, residents in the borough who are not proximate to a DLR station rely upon the national rail system, resulting in “double fares” relative to residents in the parts of London better connected to TfL’s underground transport network. Extending light rail across the borough should be lobbied for by the council among the key asks.

Energy supply

37. GBGP accepts that decarbonisation of the energy supply is principally a matter relating to the national electricity grid falling under national policy. We recognise that local micro-generation of renewable power will not meet the borough’s energy needs in itself.
38. GBGP welcomes the deployment of solar energy, which is now extremely cheap at industrial scale. We support the council’s stated aim to identify solar panel installation sites on council-owned corporate buildings and develop a rollout strategy by the end of

¹⁰ Rapid Transition Alliance (2019). *Reducing roads can cause traffic to ‘evaporate’*. Accessed at <https://www.rapidtransition.org/stories/reducing-roads-can-cause-traffic-to-evaporate/>

2021. Nevertheless, as noted in the section on new development, the leverage point is at the point of construction. No new buildings should be permitted within the borough without installation of solar panels.

39. GBGP advises the council to proceed with caution regarding biofuels. We recognise that biogas can be help to bring down emissions to the extent that it diverts use away from natural gas and uses waste streams as input fuel, but they also contribute to slowing down the transition away from burning natural gas for heat that is required. We also oppose entirely the classification of energy derived from the burning of wood pellets as renewable. The majority of trees used for such purposes are taken from Canadian boreal forest and shipped across the Atlantic. Trees take multiple decades to sequester carbon and frequently the trees felled are replaced by monocultures which destroy the ecosystem biodiversity.

Circular economy

40. GBGP acknowledges the priority given to investments in facilitating the circular economy in the CNP. The description of emissions from disposal of waste, which only accounts for 0.6% of greenhouse gas emissions, significantly underplays the importance of this item in the CNP. The embodied emissions contained within waste are the greater factor, by far. Incorrectly disposed food generates methane – a greenhouse gas 10x more potent than carbon dioxide – when redirected to landfill. Fast-moving, carbon-intensive consumer goods such as “fast fashion” items have a tremendous cost. White goods are carbon-intensive to manufacture, yet often cheaper to dispose of than to repair.
- 41.
42. GBGP recognises that the council cannot put limits on individual purchases or decrease material consumption directly. Nevertheless, the council must sponsor efforts to improve donation rates of usable quality goods to charity shops, share knowledge and skills within regarding the repair of repairable goods, connecting businesses who can use the wastes of other businesses for good effect, and so forth. Providing help and incentives to local social enterprises aimed at these goals have been pioneered by other councils in the country and should to be part of the CNP.
43. We do not understand why there is a need to delay until 2023 the introduction of a collection charge for emptying contaminated recycling bins as general waste. This should be expedited.
44. There is some evidence that requiring more sorting of recyclables actually drives up recycling rates despite creating a higher burden on the resident to sort their rubbish more granularly. The council should pilot a scheme where glass, metal, paper, unsoiled clothing, different kinds of plastics are required to be sorted individually.
45. The council should give serious consideration to adopting high ambition recycling initiatives proven in other cities. San Francisco has instituted a “pay-as-you-throw” policy for non-recyclable wastes. Vancouver has delegated the funding of its comprehensive recycling to a group of over 1200 city businesses that co-fund the Recycle BC programme through their corporate social responsibility plans. Copenhagen instituted a

by-law which forbids sending waste that could be burned at waste-to-energy plants to landfill.

Natural environment

46. Notwithstanding our comments relating to this area, it is illogical to place “the natural environment” in a separate box within the CNP. It must be recognised as a functioning and indivisible part of the policy framework which includes land use, new and existing buildings, air quality, transport, infrastructure development and health and wellbeing. It is emphatically not a bolt-on based around minor tweaks to business as usual. Token gestures like “replace 25% of 2 stroke handheld ground maintenance equipment” are almost insulting given the scale of the problem.
47. Establishing conditions for the flourishing of trees and biodiversity comprises basic investment in natural capital and must be given higher priority in the CNP, included as an integral part of planning, new development, building, transport and health and wellbeing.
48. Conservation of mature trees and protection of established habitats rich in biodiversity must be emphasised and guaranteed within the CNP. Trees have a critical role in the carbon cycle by locking away carbon dioxide for long periods and have a key role in counteracting climate change. Mature trees have a particularly vital function in the improvement of air quality, regulation of ambient temperature and protection against flooding risk. They also play an important role in reducing PM2.5 particulate pollution produced by all road transport, including electric vehicles.
49. Expert input into tree planting and maintenance must be procured. The CNP proposes to plant more saplings, which – while welcome – can take at least 50 years to reach full potential and mitigate for the removal of mature trees. GBGP notes that the council’s record on tree planting itself is mixed, with documented instances where the council planted trees inappropriate for the local habitat or the correct trees in the wrong microclimate.
50. The provision of a cabinet-level Ecology Officer would considerably aid in ensuring that avoidable errors in supporting the ecology of the borough are not repeated. For instance, the proposal to collect baseline data on tree cover and carbon storage is commendable, but the essential methodology must be planned with scientific rigour and overseen with expertise. Similarly, the intention to expand tree canopy and hedgerows in parks and open spaces is laudable but subject to failure should the appropriate expertise in developing ecological richness not be available to the sites where such activity is promoted.
51. Existing biodiversity and public health must be protected and enhanced by the immediate cessation of indiscriminate use of herbicides, particularly glyphosate, which is used by the council on a routine basis in streets and public green open spaces.
52. Green spaces should not only be protected and enhanced, as specified in the CNP, but expanded where it makes sense to do so. In particular, the creation of wildlife corridors must feature within the CNP to facilitate the enrichment of biodiversity within the borough. The council must immediately set a target for increase of green spaces as a

percentage of the overall borough land take and engage in public consultation on areas which can be reclaimed for nature.

Empowering wider change

53. There is a repeated insistence in the CNP that individuals have to play their part. We recognise that the United Kingdom is a society in which individual choice is valued. Nevertheless, as Greens, we believe that individual freedom should not be exercised where that freedom depends upon the exploitation or harm to any person or group in society or the environment. We correspondingly reject the idea that achieving carbon neutrality ought to be left in any significant degree to individual choice.
54. It is well-evidenced in the psychological literature that choice architecture facilitates actions to a significant degree and this justifies innovations such as the central government's "nudge" unit (Sustein, 2008).¹¹ We call on the council to communicate the messages that are appropriately framed given the level of certainty regarding the science and to work tirelessly to gain political consent to the 'maximum ambition' scenario interventions that are required.
55. The council must take up the mantle of fostering local and socially beneficial enterprises. GBGP notes that in Devon, for example, the county council is sponsoring "share shops" and "repair cafes" aimed at extending the life of goods and cutting down on consumption. This provides an opportunity for rehabilitation of high streets negatively impacted by the Covid-19 crisis and a chance to build back better. It is not good enough to make
56. GBGP regrets the omission of Scope 3 emissions from this analysis and acknowledges the complexity in calculating them. Nevertheless, we urge accuracy over precision by taking a wide range estimate and using that as the basis for calculation. The fact that something is hard to do does not justify ignoring it. Putting aside Scope 3 emissions artificially reduces the numerator in the carbon emissions equation (used emissions/remaining emissions), and has many negative knock-on consequences, not least that it supports justification of less action and urgency than the situation really merits.

Conclusion

57. On the basis of objective and rational scientific evidence, the council has declared that there is a climate emergency.
58. The rapid change in the habitable climate of human beings is a matter of life and death for many in the world.

¹¹ Thaler, R. H., & Sunstein, C. R. (2008). *Nudge: Improving decisions about health, wealth, and happiness*. Yale University Press.

59. The local impacts from climate change and collapsing biodiversity are barely less significant and will entail loss and harm that is personally catastrophic to Greenwich residents and communities.
60. The brunt of responsibility for mitigation must be borne by high-emitting, wealthy nations at every level of society through efforts such as executing the maximum ambition action plans described in the evidence base, which describes a wide range of concrete short-term actions that can significantly contribute to the mitigation of the climate change and biodiversity emergency that humanity finds itself in.
61. The CNP falls short of the maximum ambition scenario described in the evidence base in every meaningful way.
62. The CNP must be thoroughly improved in terms of action and urgency to bring about the changes to which the council is formally committed.
63. GBGP calls for significant improvement in governance with respect to scrutinising, implementing and enforcing the CNP.
64. GBGP calls for greater community engagement for the purposes of generating political acceptance of the maximum ambition scenario mitigations described in the evidence base.
65. GBGP remains ready and willing to put our expertise and community connections at the disposal of the council in service of bringing about radical action.