

Ealing Friends of the Earth

Comments on Ealing Borough Local Plan

Ealing Friends of the Earth welcomes the Council Leader's commitment to 'tackling the climate crisis' as the first of the "three core themes" of the Local Plan, but we believe that the plan does not put Ealing on track to meet its aim of becoming "carbon neutral, as a borough and an organisation by 2030".

The Council's 'Climate and Ecological Emergency Strategy' identifies the main sources CO2 emissions in the borough as:

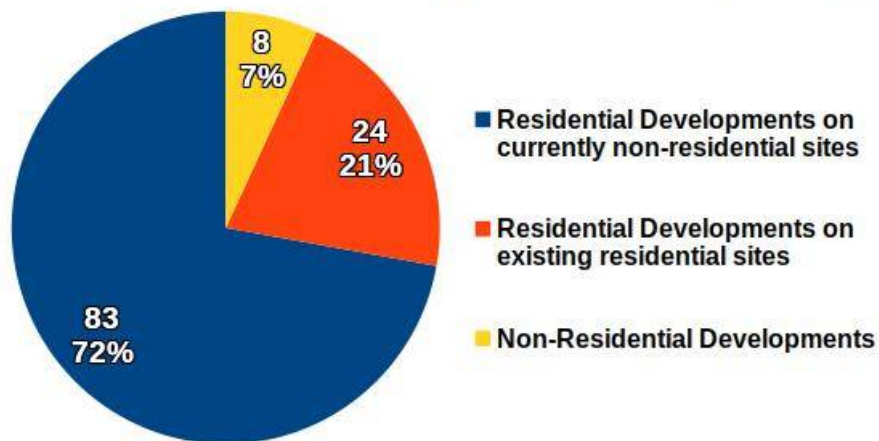
- **BUILDINGS, Gas and electricity use, residential and commercial. (over 60%).**
- **TRANSPORT, mostly road transport. (about 30%).**

Making Ealing carbon neutral by 2030 therefore requires a truly massive programme of retrofitting existing buildings with insulation, low carbon heat sources, solar panels, etc. over the next 7 years. It also requires an absolute block on any new build that is not 'carbon neutral'. For transport, it requires measures to reduce unnecessary use of large vehicles in favour of lightweight electric vehicles and active travel instead.

Buildings

Currently the major focus of the plan appears to be in Chapter 4 'Town Plans and Development Sites', which details 115 proposed new development sites, almost all of these residential and the majority on sites that were previously non-residential (such as shops, pubs, commercial and light industry premises, car parks, community centres, libraries a riding stables, etc.).

The 115 Proposed Developments in Ealing Borough

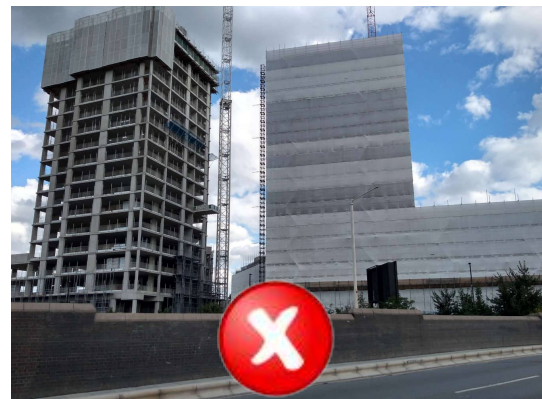


The Local Plan proposes 115 New Build developments, 93% of these part or all residential, and most on sites that currently have other non-residential uses.

Ealing Friends of the Earth believe that new-build is the wrong focus. We believe that:

1) **The bulk of the plan should be dedicated to a massive retrofitting programme of existing buildings across the borough.** Most of Ealing's buildings will still be here in 2050 and they should be the main focus, not new build.

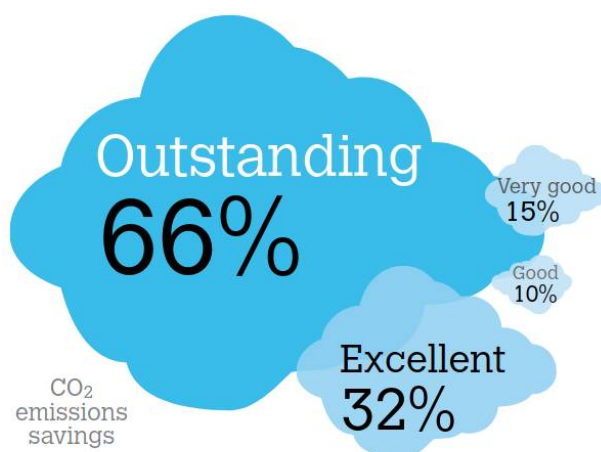
2) As advised by the Commons Environmental Audit Committee, “**retrofit and reuse be prioritised over new build**”¹.



To achieve climate goals, retrofitting our existing buildings should be the Local Plan’s focus, not new-build.

3) That where new build does take place, it should follow the guidance of the Committee on Climate Change (CCC) that “**no new homes be connected to the gas grid**”, but instead “**fitted with low-carbon heating systems (for both space and water heating) and ultra-high levels of energy efficiency**”². New build should meet BREEAM ‘Outstanding’ or exceed it.

We were told during one of the consultation sessions, that developers prefer to pay a carbon offsetting ‘fine’ rather than build to the highest standards, and that as a result, many new builds will themselves require retrofitting within 15 years or so to meet emissions standards. We understood that it is the Council’s ambition to increase the fine but that it may be constrained by current government rules. Currently, the new Friary Park development for example, meets only BREEAM ‘Very Good’³ which may sound OK but is 2 levels down from the best rating of ‘Outstanding’, costs very little to the developer and results in far poorer carbon savings (typically only 15% compared to 66% for ‘Outstanding’, according to BREEAM).



To have a hope of meeting Ealing and UK climate targets, new builds should meet or preferably exceed BREEAM ‘Outstanding’.

Average CO₂ emissions savings associated with different BREEAM ratings.
(from BREEAM Briefing Paper: ‘The value of BREEAM’⁴)

1 ['Building to net zero: costing carbon in construction'](#), Environmental Audit Committee, 26 May 2022.
2 ['Net Zero – Technical report'](#), Committee on Climate Change, May 2019.
3 Friary Park Estate, ACTON, LONDON. 'Hybrid Planning Application Sustainability Statement', Hodkinson Consultancy, March 2022. "Target Score: BREEAM Very Good".
4 BREEAM Briefing Paper: ['The value of BREEAM'](#), by Eleni Soulti and David Leonard, November 2016.

Accordingly with respect to ‘Policy CO: Carbon Offsetting’, **we urge that developers are not allowed to use offsetting to get out of building to “ultra-high levels of energy efficiency”** as called for by the Committee on Climate Change and referred to above. Therefore if offsetting is used to achieve this it should be financially punitive compared to the extra cost of building to a high standard, to ensure that developers are incentivised to do the right thing. *We do not know what level ‘punitive’ would need to be but note that that a research paper estimates the cost uplift for different BREEAM ratings and suggest that for ‘Very Good’ it is a minimal 0.1% to 0.2% of the building cost, while for ‘Outstanding’ it is 5% to 10%.⁵* These considerations also apply to ‘Policy SP 2.2 (iii) Setting measurable sustainability standards for new developments’.

4) There should be a block on tall buildings. Per unit of floor space, the embodied carbon in tower construction increases with the height of building. The reason is the higher quantity of steel and concrete required in the foundations and in the building frame. Carbon emissions in-use, also rise with height of building. [*Findings of University College London’s Energy Institute: ‘High-rise buildings much more energy-intensive than low-rise’^{6 7}*]. Retrofitting tall buildings if they failed to be carbon neutral when built, will also be more expensive. Low to medium rise terraces can achieve adequate densities and are more sustainable, evidence for which EFoE has communicated previously⁸. We do not agree with the area definitions of ‘tall building’ in Policy D9; we consider a building greater than 6 storeys to be ‘tall’, wherever it is located the borough. Historically all of the towns that make up Ealing Borough were low rise.

5) The LDP should include a detailed plan for retrofitting council housing and other buildings for which the Council has direct responsibility. While there are over 400 pages detailing new-build proposals (whose construction and use will only add to emissions), retrofitting existing buildings is only mentioned briefly. The Plan should cover the scale of the task (how many buildings), annual targets, expected emissions reductions, and the finance and legislative support needed.

Transport

Ealing Friends of the Earth supports the 20 minute neighbourhood concept described in the Local Plan, with the goal of “enabling people to fulfil the majority of their daily needs within a 20-minute round-trip walk from their homes”. We note however that the proposals to redevelop 83 currently non-residential sites as ‘residential’ or ‘mixed residential and other use’, implies a diminishing amount of space for the other facilities that people need, whether it be shops, workplaces, community centres, waste & recycling, leisure facilities, etc., and contradicts the 20 minute neighbourhood ambition. At best it leaves a poorer second-class facility where a more spacious one formerly existed.



Traffic is the main source of air pollution and a major source of CO₂ emissions. To reduce it we need to retain non-residential sites to provide space for local jobs and amenities within 20 minutes walking distance.

As car ownership and use declines, there will be a growing need to create or re-create these local facilities within a short distance from people’s homes, e.g. recycling centres of which only the Greenford site remains. For that to be possible we need to retain non-residential sites because if residential infill is built on them, they become very difficult and costly to recover. For similar reasons (the need to maintain local sources of employment) we

⁵ [‘Implications of Achieving BREEAM Outstanding’](#), Hodkinson Consultancy.

⁶ [‘High-rise buildings much more energy-intensive than low-rise’](#), UCL News, 28 June 2017.

⁷ [‘Carbon emissions rise with height of building’](#), July 2017, ICBSE Journal, Chartered Institution of Building Services Engineers.

⁸ [‘Towers or Terraces’](#), Ealing Friends of the Earth, February 2022 (referenced report downloadable).

support the retention of industrial sites in Policy E4: Land for Industry, but note again that the many proposals in the Plan to redevelop currently non-residential sites as ‘residential’, negatively impact this goal.

Policy SP 2.2 A (ii) ‘Enhancing active travel networks’: We would like to see more detail of the proposed “high quality pedestrian and cycle routes” and consultation with those who do not or cannot drive (especially the young and the old), on what are the main obstacles or difficulties they encounter, e.g. a difficult junction, steps, nowhere safe or covered to leave a bike, etc..

Open Space and Urban Greening

Policy G4: Open Space: We do not support construction on green and open spaces. We agree with the aim of *preserving green and open spaces with regard to views to, from, within, and across these areas*. In this context we note that the forest of towers particularly in the Acton area have had a disastrous effect on the visual quality of spaces like Wormwood Scrubs: where once most of the Scrub’s skyline was treetops, it is increasingly hemmed in by towers.



Other green spaces are similarly affected: the skyline of North Acton Playing Fields was until recently the roofs of the houses adjoining it and trees, but towers now dominate.



Familiar views from our green spaces of skylines comprising tiled roofs and trees, are increasingly blighted by towers.

Carbon emissions per unit floor area are far higher from tall buildings, both in construction and use, than for low-rise. [see text]

Policy G5: Urban Greening: We support higher targets for urban greening. This could include small areas as well as larger ones, such as roundabouts, plants at pavement edges and on verges, etc. It is also an opportunity for local community involvement and environmental education.

Expanding existing standing water areas and creating new, is also important for nature. For example EA34 - Old Actonians Sports Ground development proposal is for a site that contains a large pond. Ponds like it are rare in Ealing and it should surely be protected, ideally along with the playing fields and community facilities on the rest of the site.

We support Policy SP.2.2 ‘B(i) Supporting circular economy principles’ and in particular encouraging re-use and repair. We suggest the creation of a **ReUse Shop** like that run by the North London Waste Authority⁹ which provides a way of saving items that local residents no longer required and were brought to our reuse and recycling centres for disposal, but are in a good, usable condition, and can be re-sold to the public.

9 [North London Waste Authority ‘ReUse Shop’](#).

Democratic Involvement

Ealing Friends of the Earth appreciates the wish of the Council to consult on the Local Plan. However getting public engagement with such detailed, lengthy documents and complex issues, is clearly challenging – *we observed at one town hall session that there appeared to be only about 8 members of the public attending (the rest being council officers or consultants)*. We suggest the use of some sort of local citizens' assembly, operating over a longer but defined period. There is strong evidence that such assemblies are a better way to involve, consult, educate and provide a constructive outcome, as demonstrated by citizen assemblies held in Ireland¹⁰ and several other European countries¹¹, including in the UK the Climate Assembly¹² set up by parliament.

Businesses with a CSR¹³ policy and local community groups might be willing to send representatives to a local assembly, with incentives to attend that could include for example a certificate issued to each attendee the end of each year. Our young people will be the most affected by the development of the borough and by climate change, and there are good opportunities to involve them. Students in schools and colleges are already in structured environments where consideration of chunks of the Local Plan could integrate into a variety of studies from civics and politics to geography and science. Young people could also participate as their volunteering activity component of the DofE and NCS schemes¹⁴.



Photo: UNICEF

Ealing's young people deserve a major role in shaping the plan, and to be given the time and structure to do so effectively.

'Nothing about us, without us'

Limitations and Openness

We are conscious that making Ealing Borough carbon neutral by 2050, let alone the Council's 2030 target, is a huge undertaking. We believe that local councils cannot be expected to achieve such targets without very substantial support from central government in terms of legislation (mandating stricter building regulations, etc.), finance, and action nationally. We would prefer the Council to be open about what it can realistically achieve as things stand, and to say loudly and clearly what the obstacles are and what backing it needs from central government or elsewhere to meet the climate goals set out in the plan.

Ealing Friends of the Earth

9th January 2023

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10 ['Citizens' Assemblies: How can the UK learn from Ireland?'](#), The Constitution Unit, UCL.

11 ['Can Citizen Participation Really Revive European Democracy?'](#), the Open Government Partnership.

12 [Climate Assembly UK](#), commissioned by the House of Commons.

13 Corporate Social Responsibility.

14 [Duke of Edinburgh's Award](#) and [National Citizen Service](#).