

Response to Ealing’s Local Plan, Initial Proposals (Regulation 18), 30 November 2022

We are responding to policies SP.2, SP.3, DAA, G5, CO

Policy SP.2: Tackling the climate crisis → Policy SP 2.2 Climate action

Policy SP.3: Fighting inequality → Policy SP 3.3 Healthy lives

In our view, each of these policies should **specifically include** front gardens. There are about 74,300 front gardens in the London Borough of Ealing. Since 1995, when pavement crossovers became “permitted development”, people have been able to destroy their front gardens by turning them into car parks. Householders can completely pave or concrete their front gardens as long as they put in token drainage.

In 2005 our research found that a quarter (18,300) of the borough’s front gardens were completely hard surfaced. Six out of 10 (44,600) had 70% or more of their area hard surfaced. Since then amounts have steadily increased, and drainage provision is often inadequate or non-existent.



In the last few years, overnight charging of electric vehicles has further increased demand for extensive front garden parking. Paved front gardens on both sides of a road doubles or triples the amount of hard surfacing – effectively widening the road surface 2 or 3 times.

These extensive paved / concreted hard surfaces are creating major damage – exactly what the above Local Plan’s policies set out to reduce. This damage includes (see references at end for evidence):

1. Flooding: “porous” surfaces and “drainage channels” can’t cope with increasingly-common torrential downpours and in any case drainage is often poorly installed, blocked or completely absent
2. Over-heating: heat island effect in built-up areas: hard surfaces absorb heat and release at night. There is no plant cooling (evapotranspiration)
3. Biodiversity loss – of plants and in soil
4. Reduced food supply for pollinators
5. Increased air pollution – more dust, no pollution-absorbing hedges and trees
6. Increased water pollution – run-off picking up contamination, not cleaned by percolation through soil
7. Less CO₂ absorption – both by plants and by soil sequestration
8. Environmental damage – quarrying, manufacturing and transporting hard surfacing materials e.g. “Indian sandstone”
9. Increased risk of subsidence as soil beneath hard surfacing dries out
10. Loss of boundary structures and unattractive neighbourhoods create societal problems and encourage vandalism
11. Loss of green space has adverse effects on mental health

Policy DAA: Design and amenity – Ealing LPA – local policy

As shown above, hard surfaced front gardens and parking spaces cause adverse impacts (section 5.7) and negative visual impact (section 5.12). These need to be included in the policy as prohibited aspects of development.

The London Plan’s Policy H2: Small sites specifically mentions returning hard standing to green space, so as to minimise minor housing development impacts on existing biodiversity or green space. We assume this will also be included in Ealing’s Local Plan.

Policy G5: Urban greening – London Plan – Ealing LPA local variation

Front gardens should be included in Ealing’s definition of community green space in this Policy. This is because:

1. Private gardens account for about a quarter of London’s total footprint and front gardens for about a quarter of that.
2. As shown above, what householders do to their front gardens can have major detrimental effects on the surrounding area.
3. They are evident to everyone, and have a major effect on the local environment and its aesthetic and amenity value.

It follows that front gardens should be treated as having community value, and hence as community green space. Householders should consequently recognise/be informed that they have community obligations in this respect.

This would be an innovative but entirely defensible approach.

The 2021 London Plan includes a non-exclusive list of the factors which can contribute to Urban Greening (page 324). Permeable paving, often used to hard surface front gardens, is at the bottom of the list. This supports the case for

Ealing requiring minimum and greener surfaces, such as reinforced matrices, to provide parking surfaces in front gardens, and depaving wherever possible.

Policy CO: Carbon Offsetting – Ealing LPA – local policy

The retrofitting existing housing stock included in this policy should also include depaving and returning hard standing to green space, as it offers a gain due to carbon sequestration.

References

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