

From:

Sent: 07 February 2023 18:20

To: 'localplan@ealing.gov.uk' <localplan@ealing.gov.uk>

Subject: CARBON IMPACT ASSESSMENT Feb2023 For LOCAL PLAN CONSULTATION RESPONSE

Dear LBE Local plan Architect and PINS inspector,

1. May I first quote case law on “Consultation” derived from an article in “The Local Authority Lawyer”.

Public and resident consultees should be consulted at the “Formative Stage”.

While Covid got in the way I can't remember council representatives called Councillors engaging with the public over plan items

This Local Plan document looks as though it was “pulled out of the hat”.

Consultees should have time to consider the elements they are to be consulted on.

This consultation ran over the Christmas period which for many of us removed 14 days and this short period does not do justice to the length, complexity and importance of the document. Less important consultations run for a number of “ordinary weeks” with plenty of time for respondents to make their view known.

2. We live in an energy Crisis. The attachment is a slightly reworked version of a similar paper sent to senior councillors.

Some if not all of the elements in this paper should be incorporated into every planning application. Developers don't like it but

it really is important now. We've seen perfectly good buildings and important facades demolished simply to make replacement buildings easy to build.

3. General comments using paragraph numbers from the Plan booklet

0.7 the needs of our communities have never before been at the heart of decision making. How is that reversal come into existence?

0.20 I don't understand “good growth”.

1.1 How do you ensure developments are sustainable? Flats and shops in Dickens Yard are unoccupied after all this time?

2.10 Will Ealing grow and support an aging population?

2.13 I can't see how the imbalance between new jobs and homes can be resolved.

2.23 I don't think the officers or councillors understood the attachment. There aren't the skill sets in the council to attack this problem.

2.30 Plenty of empty shops in Dickens Yard so how does council think they can influence employment policies?

2.46 Ealing an “Inclusive Place” but nowhere is step-free access at Northfields Tube station mentioned. For those of us getting older these are important elements. Similarly many older people without disabled badges use cars to maintain independence. Not appreciated by this council. Two wheels good four wheels bad!

SP2.1B Council already sold off? Town Hall and stolen Victoria Hall . Anything left to keep for the public in Public use.

3.15 Make it clear. All future buildings must have solar panels. Prohibit gas connections.

3.21 Recently I have had to clear inspection chambers that were blocked by supercharged sewers.

Solids coming up into customers inspection chambers. Not seen it before. Future overload?

SP4.1E tall buildings how do they compliment anything..just casting long shadows over neighbours quite wrong.

3.34 Ealing hasn't had a heritage/conservation officer for some time. We lost a Woolworth's façade recently. Rare and beautiful. Gave a sense of place to West Ealing.

3.35 How does a tall building "fit in" .It takes more energy rich materials to build and more energy to heat and service ???

4.2.18 20 minute neighbourhoods? Some items in my weekly shop are three times the price locally than if I drive. Are you bringing back retail price maintenance?

4.2.14 North-south movement could be greatly improved by modifications to Jacob's Ladder spooky after dark and challenging to the elderly.

4.2.16 Empty shops in Dicken's Yard could be let to new businesses. 19 shops in new development in Hanwell ditto. Who thought they were a good idea?

4.2.24 Don't understand.

4.2.25 What is urban greening?

4.2.26 Obsession with cycling down Uxbridge Road . There is a parallel route much safer, better surface, fewer cars and no stopping and starting buses. No one listens.

Low traffic neighbourhoods. These were installed by incompetent officers who changed signage because it was poor a number of times. We were told they were a trial but nowhere was the methodology of that trial explained. It achieved nothing.

May I apologise for the incomplete and curt nature of this submission. The council have a record. I can't see them changing their spots even with this beautifully presented almanac.

██████████ 7 Feb 2023

Submission to Local Plan Consultation

Norman Foster (Lord foster of Thames Bank) stated in a letter to the Times 16 Jan 2021 that the construction sector was responsible for 45% of carbon emissions in the UK.

The London Borough of Ealing declared a Climate Emergency in April 2019.

That declaration surprisingly mentioned nothing about construction in its report.

To remedy this major omission every planning application should now be accompanied by a **Carbon Impact Assessment**. This assessment to be arranged and approved under these categories.

Further a Councillor member of the planning committee must review every application from a Climate Emergency perspective. Far too many applications have slipped through with minimum scrutiny under delegated powers.

- 1. Demolition.** A measurement of embedded energy that is contained within the materials of the structures already on site that are to be removed or used as low value hard core or land-fill. Eg:-

Material	Embodied energy MJ/kg	Mass total	Energy total
Brick	3.5		
Concrete	1.1		
Concrete roof tile	4.3		
Glass	28.5		

Continuation and summation of totals.

Distance that loads above are planned to be carried in km

- 2. Oversight, foundation excavation and basement excavation.**

Description of volume, mass and distance carried. Site nearby produced 1000 tonnes of subsoil for three troglodyte flats

- 3. Area of green space garden to be removed in square meters**
- 4. Estimate of trees to be removed in sapling equivalent.**

- 5. Building design to be assessed in terms of climate impact with mandatory standards eg:-**

Heating	Lighting
Insulation	Solar Panels (Compulsory)
Heat recovery and heat pump technology	Maintenance
Lifts and pumped water supplies	Overshadowing of neighbours
Privacy of neighbours	Impact on existing local facilities
Impact on housing lists	Air conditioning due to position

- 6. Prohibition of use of Carbon Offset trading**



This submission is part two. Previous submission sent yesterday 7th Feb.

- 1) There seems to be a default position to build houses. It isn't clear what type of houses Ealing Council feels it needs to have built and for whom. When homes can't be sold or occupied then they are marketed abroad. Some homes appear not to be occupied and have remained empty for a long time. In this Plan I would expect to see numbers to convince me that all this building and intrusive building was needed. What had been provided in the past and what had been sold abroad and to whom (note recent news item on transparency and overseas money and investment in UK).
- 2) There seems to be an obsession with 13 storey and 21 storey residential blocks. Why have these been chosen. Such residential blocks require lifts, pumps, ventilation and high energy structures. This means that they are not very green. Every site seems to have detailed this type of recommendation. Buildings of lower height don't require so much cement or steel in their construction. They are easier to maintain. High densities in housing can be achieved using low rise house buildings. Further they don't take account of shadowing especially in the winter months with low sun elevations and when sun is most needed. When at a site meeting I showed the planning committee a site model built to scale with a lamp set at elevations at midday in winter they were shocked of its shading effects on neighbours. Has anyone reviewed these planned developments from this aspect? Almost certainly not.
- 3) The next question is where are we going to place these new homes. You can plan to place them into retail car parks and get rid of the parked cars. For us the compromised and elderly this is the medicine we don't need. Many of us are only just independent/ self-sufficient. We have to carefully plan journeys by car to meet Drs, Nurses and dentist appointments. The car gives us choice and independence. The use of a retail car park gives you access to other retail outlets so smaller retail centres remain viable. The council seem blind to these common-sense ideas and this is reflected in their choice of sites. They don't like cars (neither the leader or the deputy leader drive) but they are happy to install car charging points. They even charge cars parked for funerals. The transition is too fast.
- 4) Facilities like Drs Surgeries are full and schools are full. I don't see much integrated service provision for growth. If councillors had held meetings in wards then they would have picked up problems like this. No this plan was devised and produced by a few members and officers centrally and in vacuo.
- 5) One site recently developed in Hanwell lost a mature street tree just before it was developed. I see the same process on proposed site HA03 lost mature tree on south-east lower corner near 201.
- 6) Open spaces are under threat some much loved especially during Pandemic. Warren Farm a good example where who before couldn't care less and let this facility fall into disuse now piles its weight against public opinion. Other wild areas in its sights. Need these as more people drawn in by new developments. All these low level uses not regarded as valuable by this plan
- 7) Ealing has no Conservation officer and planners don't even have a feel for conservation areas because in the past houses have been demolished and replaced with flats in conservation areas.
- 8) Thank you for reading this