

## **Matter 4 – Climate Change and Sustainable Development Ensuring Sustainable Delivery Chap 6 Issues and questions**

**1. Does the Core Strategy provide an appropriate, effective and soundly based framework for providing access to jobs and services, including the provision of an efficient, safe and sustainable transport system to meet the needs of all transport users, which is fully justified and supported by robust, up-to-date and credible evidence and consistent with national policy?**

Problems that arose under UDP policies are likely to be greatly increased by the Core Strategy because:

- 1) national policy is in the process of major change and it is very difficult to ensure policies are up to date and consistent.
- 2) There is a lack of local evidence. Population, household and employment information is inaccurate and mainly relating to 2009. Up-to-date details of journey to work are lacking.
- 3) The CS depends upon the PPG/PPSs and London Plan and the former are to be abolished.

### Transport System Policy 6.1

Access to jobs and services depends on an efficient transport system but sustainable development should minimise the use of energy by ensuring provision is locally based.

The problems that prevent sustainable development reducing energy use include:

- \* Bus services delayed by traffic congestion due to main roads at capacity or lanes blocked by parking or loading. Bus delays increase car use when drivers prefer the comfort of private transport or can take short cuts along side streets.
- \* Inadequate space for a bus station at Ealing Broadway bus stops/car drop off points at most stations.
- \*Lack of safe cycle paths and stands in the right place where they do not block pedestrian movement
- \* Lack of facilities and work available on a local basis to reduce the need for car journeys and use of overcrowded transport.

Major schemes are only under investigation. The provision for N-S and orbital transport links seem hypothetical as they are not funded and land is not safeguarded. The transport improvements are focused on Crossrail and CPZs as local priorities although LIP corridor schemes in Appendix 3 do not make clear the type of improvements proposed in the next 5 years. CPZs prevent local town centre peripheral parking thus reducing their viability. This may not matter if car parks are adequate in the town centre and costs can be borne by drivers but problems arise where provision is lacking as it is for example in Ealing Broadway and Southall.

Local parking restrictions and provision of paying car parks should be targeted at:

- \* reducing congestion on the main bus routes with minor road improvements;
- \* helping bus timetabling; and
- \* reconsidering parking provision and signage in relation to traffic movement.

(Examples include buses delayed at congested Roundabouts on the Argyll Rd W13 which impede their movement or Ealing Broadway pay parking is only accessed by car drivers from the North if they enter the congested The Broadway/Uxbridge Rd. There are many improvements that could be made by consulting bus drivers about their routes and resident associations about causes of congestion in their immediate areas.)

**We consider that Transport improvements including LIP schemes should be clarified in Appendix 3. Parking and loading policy should be reassessed in all areas with a high PTAL and along main traffic routes to ensure vehicles move evenly at the appropriate speed to help keep fuel consumption to a minimum. Pay parking or free shoppers' parking in the Town, District and Local Centres should be located to minimise the need to search for space that uses further fuel and increases congestion.**

#### Social Infrastructure Policy 6.2

The definition of the meaning seems too wide. Provision affordable housing for elderly people and independent living are housing issues and employment development should be excluded. Services are assumed to include education and PPS4 town centre uses other than retail which is discussed in matter 11. This policy claims that the Council can provide much of the land for local infrastructure which is not demonstrated in this CS: schools cannot currently be provided without over-developing sites, rebuilding rather than extending or building on protected open space.

New Map 10 is too small a scale to be of much use in commenting on community facilities unless you know all the sites listed in Appendix 3. The provisions listed in policy 6.2 are inadequate. The map and Infrastructure delivery schedule should relate to this policy. Other issues include:

1. The target for Children's Centres is unachievable if only four are to be provided in the next 5 years.
2. There is no mention of cultural or community facilities in policy 6.2, the Vision or its Delivery, yet cultural facilities are to be provided in Ealing Town Centre, and Hanwell and Ravenor Farm community centres in Appendix 3. There are more in the Borough but they are not mapped on new map 10
3. Problems with health and education sites are listed under the Infrastructure Delivery schedule but we do question planning for '*rail links for high schools that have a wide catchment area*'. Schools near a station will naturally have a wide catchment area but it is not possible to plan rail links for schools that do have a wide catchment area without moving the school (e.g. Cardinal Wiseman in its recent planning application for expansion recorded a borough wide catchment with some pupils coming from other boroughs yet it has no rail link and there is no way the Council could plan for one).

We are particularly concerned that cuts in investment in community centres make it even more difficult for community groups to raise running costs e.g. Hanwell Community Centre is underfunded and the loss of the Priory Centre to a school site before adequate alternative premises are available. Using Neighbourhood Areas illustrated in Map 3 would make comparisons of all these facilities easier, especially if the areas are redrawn to represent catchments of the town, district and local centres of the Boroughs and not just groups of wards balanced to give a standard number of voters.

Improving access to built leisure facilities should not just be a matter of providing bus services and cycle lanes but actually locating built facilities in town centres.

We note distribution of LBE sports/leisure centres is very uneven. There are;

- \* 2 in Northolt including a very spacious leisure centre with 2 pools;
- \* 3 in Southall;
- \* 1 in Greenford with Gurnell pool close to Greenford Town centre;
- \* 1 in Hanwell:

\* 3 in Acton including a swimming pool.

There is none in Central Ealing where much of the increase in population is concentrated and which is recorded in the London Plan as having an important evening economy. Currently this is mainly eating, drinking and gambling with some clubbing. There seems to be a lack of all other facilities as well. The infrastructure delivery schedule shows new sports facilities will only be provided in Schools in Hanwell, Southall, Greenford and W13 rather than Ealing Town Centre that lack these facilities.

The information on community, cultural and leisure facilities shows their absence in the areas proposed for population growth. Unnecessary moves for co-location may not be the most sustainable solution to provision for social infrastructure. The loss of historic assets to facilitate this modernisation should be given greater weight where local people wish to see them retained.

**We consider that the CS should express commitment to a full range of service facilities mentioned in PPG4 for town centres if development is to be sustainable and sites should be safeguarded for provision. The references should be inserted in both policy 6.2 and relevant Corridor and Hinterland policies.**

## **2. Whether the policies on design, sustainable construction and renewable energy are appropriate and justified?**

The DNPPF promotes sustainable development but does not define it adequately. In the absence of Government action to provide a definition it should be defined in the CS.

The UDP relied on low-car use, town centre mixed uses as a sustainable land use solution to reducing car journeys to work and therefore save energy. Unless low-car use housing is built by housing associations there is little affordable provision. In practice such housing generates street parking problems spreading away from town centres as CPZs are introduced. Surveys of the work places of new residents are not available but as these high rise flats are near stations it is likely they are commuters. They may still need cars. Journey to work or school may be lengthy or complex and residents find alternatives to on-site parking. This may be a convenient way of providing housing units but it may not reduce the need to travel or a resident's carbon footprint.

Policy 1.2 e) deals with design and construction of buildings not the relationship of land uses and an amendment is proposed in Matter 1. Reducing the need for energy in a building may be justified in the Towards Zero Carbon report but there should be some explanation in the text.

We are in favour of decentralised energy networks in principle but district heating has not proved successful in this borough in the past; the use of roofs for generating heat and electricity should be encouraged in the design of buildings. Techniques of low energy construction and information on sustainable building materials developed by the Building Research Station should be included as a reference.

Problems of hard surfaces, the need for permeable construction and issues with areas with a high water table should be referred to specifically in Policy 1.2e).

**We suggest the following amendment to Policy 1.2e):**

**Insert in the second line 'with permeable surfaces unless there is a problem of a high water table' after 'other physical infrastructure'.**

**3. Key policy 1.2(e) how would sustainable design and construction be effectively monitored, would there be a link to the Code for Sustainable Homes and BREEAM and the targets associated with those codes?**

Larger planning applications are currently accompanied by a sustainability checklist but it is not clear whether this will continue. The scores are usually rather low and the checklist is not comprehensive. ECS would like to see more information on delivering this included in policy and text.

The London Plan has a Decentralised Energy policy 5.6 which covers combined heat and power which we assume is intended here. The Mayor's energy policies also include: Renewable Energy 5.6, Innovative Energy Technologies 5.8 and Overheating and Cooling 5.9 all of which are relevant to energy efficiency. The cooling hierarchy in policy 5.9 B ranges from:

1) minimising internal heat generation through energy efficient to  
4/5 passive and mechanical ventilation

6) active cooling systems (likely to be the preferred option in a noisy environment).

Retention of the checklist with more specific scoring would enable some monitoring.

**4. Reference to decentralised energy appears throughout the plan and underpins the majority of the policies. There is no indication of what is meant by decentralised energy.**

This should be clarified either in the text or in a glossary.

**5. It is not clear in key policy 1.2(g) which is responsible for creating the specified tonnes of waste and whether it would accord with policy 5.16 of The London Plan.**

Residents have considerable concerns about the large amount of waste that is to be dealt with for six boroughs and Policy 5.16 which promotes London self sufficiency for waste.

The methods of achieving this are listed in the policy but the premises for the processes may cause environmental problems. (At a recent consultation meeting with residents within Park Royal over waste management many people expressed concern at the prospect of large amounts of West London waste being processed near their homes and the road traffic it would create on access roads. The boroughs named do not include Hammersmith which has facilities adjacent to this borough so that the impact on resident could be even greater than the 6 boroughs mentioned especially as Hammersmith is linked with Westminster in dealing with its waste.)

**6. Key policy 1.2(i) is this an aspiration or are there particular areas/routes that would be targeted or criteria that should be met for electric charging points?**

The proposal is supported especially if they are provided in public car parks.

**7. Is resistance to the extraction of land won aggregates in key policy 1.2(j) justified in the light of the requirement in The London Plan policy 5.20 and its supporting text?**

There does not seem any merit in terms of sustainability in excavating precious open land sites in the borough, which are either in park or playing field uses, have identified nature conservation value or contribute to the historic landscape. Many sites in the borough were worked for brick earth in the 19th century and the depths of deposits over London clay are limited. The borough has good rail access to workable deposits elsewhere and a good supply of reused concrete aggregate from big demolition schemes in central London. This seems to be explained in the text

Aggregate recycling depots however create problems of noise and dust particularly at Horn Lane in Acton.

**We consider that the Reference should be deleted and the facility accommodated in a more suitable location and building, not next to a site that is to accommodate housing as part of a Crossrail station redevelopment at Acton Main Line.**

**8. Key policy 1.2(k) is prescriptive and should ‘all sites to be subject to a sequential test...’ From PPS25 it would appear that only development in areas of flood risk should be sequentially assessed. Is the policy justified and consistent with national policy?**

PPS25 would be abolished when the DNPPF is finalized and the sequential test in para 156 of the Framework seems to apply to all sites. During heavy rainfall in this borough flooding is a common site in streets that are not classified as a flood risk. It is unsound to permit building on open space in the floodplain itself. Even if precautions are taken to raise floor levels above the highest known flood the loss of water storage capacity will make the situation worse downstream.

**We would prefer the refusal of development in these locations to be maintained (e.g. an intensive recreation scheme was refused on Brentside playing field adjacent to the Brent River at Greenford). Such a refusal does not sterilise sites for development but leaves it with a flood, recreational and nature conservation function.**

The existing floodplain should not be further developed because climate change is already increasing flash flooding and greater precautions will be needed as London’s climate becomes more extreme by 2026. The evidence base contains many documents but the two most useful references are the Map in Appendix C-1 which shows the 1 in 20 flood risk and historic flooding areas. This should be reproduced in the Core document and a reference made to Volume 2 para 3.29-3.30 where lost tributaries that have been culverted may give rise to localised flooding because natural drainage is no longer possible. Drainage into the sub-soil is decreasing and the rate of water runoff increasing by concreting over more land, in particular hardstanding at the front of domestic properties (not apparently ameliorated by recent changes in planning rules).

**We consider that the CS should emphasise the importance of permeable surfaces in relation to sustainable design. Also add to policy 1.2k ‘no new development will be allowed on the existing Brent River Floodplain that reduces its potential to accommodate floodwater.’**

**9. The introduction to Chapter 6, reference to maps 9 and 10 being updated in the IDP report 2011. Do any of the changes go to the effectiveness of policies in Chapter 6?**  
There are no new community or leisure facilities in Ealing other than a temporary arts centre in an office block. A community centre is being closed in Acton to provide a site for a school.