Written Statement
Ealing Council Statement 4: Climate Change and Sustainable Development LPA4

Tuesday November 15\textsuperscript{th} 2011
1. **Introduction**

1.1 The issues to be addressed in this hearing statement are:

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?

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

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?

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

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

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

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?

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?

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?
2. Sustainable transport

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?

2. Yes. The Core Strategy [EAL2] seeks to steer development to the most appropriate locations, which are accessible by a choice of transport modes. High trip generating uses, such as retail and employment, are to be guided to locations that have a high public transport accessibility level and that offer adequate opportunities for trips to be undertaken by walking or cycling.

2.2 Development will also be encouraged in a form that minimises the need to travel in order to reduce energy consumption, reduce carbon emissions and to ensure that walking, cycling and public transport are viable travel options for users.

2.3 This follows the integration of land-use and transport principles, which are advocated in Planning Policy Guidance Note 13 (PPG 13). This approach is also consistent with the London Plan 2011 and the revised Mayor's Transport Strategy 2010.

3. Design, Sustainable Construction and Renewable Energy

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

3.1 The Development Strategy [EAL2] does in fact make reference to sustainability issues, although it is acknowledged that its role is not to set out detailed policies dealing with each aspect of sustainability. The Strategy is a document whose main task is to describe at a strategic level the nature of change in the Borough over the plan period. It recognises that planning has an important role to play in forming sustainable communities, and it for example identifies spatially opportunities for the establishment of decentralised energy networks. Its role however is not to set detailed targets or policy criteria, instead such policies are better covered through the emerging Development Management Document [DMDPD][EB5].
3.2 In particular, policies promoting energy conservation through sustainable design and construction and renewable and low carbon energy are detailed in the emerging Development Management Document [EB5]. These have been underpinned by an energy evidence base prepared in line with the Government’s guidance including PPS1: Delivering Sustainable Development (2005), its supplement PPS1a: Planning and Climate Change (2006), and the adopted London Plan 2011.

3.3 The Development Management DPD seeks to adopt the policies and targets in the London Plan in relation to energy and sustainable design and construction. Supported by the findings of the energy evidence base, the Council has however also identified a number of areas where it would wish to supplement these policies, and accordingly sets out local variations to the London Plan policies. This approach is also consistent with the draft NPPF that gives the Council discretion to set their own targets to reduce carbon emissions. This includes for example widening the scope of policy to cover minor developments, and setting best practice advisory targets which exceed the London Plan targets and are tailored for different use classes and which are further broken down in terms of savings achieved from a) energy efficiency measures, b) combined heat and power, c) on-site renewables, in line with the principle of the Energy Hierarchy. In this regard, the council will seek to reduce energy usage in buildings by requiring all developments to demonstrate that they have minimised on-site carbon dioxide emissions by using less energy through maximising energy efficiency, supply energy efficiently using low carbon heating and cooling systems, and using on-site renewable generation.


3.5 In response to representors 185, 105, 175 and 172 and in the absence of any reference of sustainability and renewable energy issues under their original representations, the Council would like to point out that while the concept of sustainable development runs throughout the Development (Core) Strategy [EAL2], the details of it will be covered through the policies under the Development Management Document [DMDPD] [EB5]. The DMDPD brings together not only those policies that conform to the London Plan and deal with new developments but also a number of supplementary policies for mitigating and adapting to the impacts of climate change in the existing environment.

3.6 As the Development Management Document [DMDPD] [EB5] conforms to the London Plan 2011 policies, it avoids repeating or reformulating national or regional policies (in line with PPS12, Para. 4.30).
3.7 With regards to decentralised energy networks and in response to representor 185, although the concept is the same with that of district heating used in the past in Ealing, the difference lies in the technological advances and the growing experience the UK has accumulated over the years.

3.8 In particular the UK’s centralised energy network is characterised by significant generation of waste heat at power stations in locations remote from concentrations of demand. Transmission losses are also associated with electrical power distribution. A decentralised system that produces energy in the form of heat and electrical power at or near the point of use provides the opportunity to improve utilisation of energy and reduce the carbon intensity of the energy network. This results in an improvement of the efficiency of energy supply.

3.9 The Mayor of London has set in place an ambitious trajectory of reducing CO₂ emissions by 60 per cent (from a 1990 baseline) by 2025 and decentralised energy provides one of the most effective routes to help London decarbonise. The target has been set to produce 25 per cent of London’s heat and power use from localised DE schemes by 2025 with focus on Combined Heat and Power [CHP] and district heating.

3.10 District heating networks served by CHP plant are considered to have the largest potential for carbon dioxide emission savings. It is an efficient technology in terms of utilising the full energy content of primary fuels with efficiencies of up to 80% and it is considered highly suitable technology for urban areas such as Ealing which has the right mix of both existing and future developments with mixed heat demand (e.g. commercial, residential and retail using energy at different times of the day).

3.11 The Heat Mapping Study [EB18] evidence base has identified 8 focus areas with potential for developing such networks. These opportunity areas are identified within the Development Strategy. The development of a decentralised energy project could provide these areas with low-cost energy while lifting the households out of poverty, increasing land value and stimulating economic activity.

4. Monitoring

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?
4.1 All CO\(_2\) emission reduction policies proposed in the emerging development management document will be effectively monitored as these are aligned to current/future Code/BREEAM/London Plan levels. Local best practice standards are also incorporated. The Council, in particular, seek from all major developments to submit a Post-Construction Assessment that is certified by the British Research Establishment [BRE].

4.2 Greater London Authority [GLA] has recently developed a monitoring tool that it will publish and circulate to all boroughs later this year. The tool will require all boroughs to start monitoring any renewable and low carbon technologies and decentralised energy networks installed in their boroughs and report back to the GLA.

4.3 The Council is also currently investigating the potential to secure an energy monitoring service. The Council will require developments to demonstrate compliance with its energy policies not only through energy statements, as required by the London Plan, but also through actual generation data that the developer will be required to submit to the Council.

4.4 The monitoring service will be able to provide actual energy generation and CO\(_2\) emission data from on-site renewable and low carbon installations. By receiving actual energy and CO\(_2\) emission data, it will allow the Council to track and confirm compliance with Ealing's energy planning policies.

4.5 The energy monitoring service will also assist the Council with the collection and report of actual energy data to the GLA's DE monitoring tool.

5. Decentralised Energy

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

5.1 The importance of creating sustainable communities in Ealing is evident in the Core Strategy [EAL2]. To make this a reality, the Council’s approach is to work closely with partners to promote and develop decentralised energy or low carbon network(s).

5.2 The development of a decentralised energy network could provide the area that will be connected to it with low-cost energy while lifting the
households out of poverty, increasing land value and stimulating economic activity.

5.3 The aforementioned benefits of decentralised energy can play a key role in transforming Ealing during the plan period and onwards. It was therefore determined to include it in every area identified having significant potential for developing such networks.

5.4 Reference is already included to the Heat Map Study [EB18], where further detail is provided. Further detail is also provided in Policy 5.5 of the London Plan (2011). A definition could be included in a proposed LDF Glossary.

6. Waste

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

6.1 The figure of 455,000 tonnes referred to in policy 1.2(g) is derived from table 5.3 of the adopted 2011 London Plan. This figure is the amount of waste apportioned to Ealing by the year 2026, i.e. the end of the plan period.

6.2 The collective figure for all six West London boroughs for this period is 2,018,719 tonnes.

7. Electric Charging Points

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

7.1 The Council will install electric vehicle charging points in public car parks by 2014. This project is identified as Neighbourhood 13 in the adopted Local Implementation Plan 2011-2014 and will be monitored under the Electric Vehicle Charging Points Target. This approach is consistent with the Mayor’s Transport Strategy 2010.

7.2 The Council will also request that electric vehicle charging points are provided within appropriate developments. This is in accordance with the criteria set out in the London Plan 2011.
8. Minerals

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?

8.1 As a borough with unworked reserves Ealing was apportioned a share of the West London land bank target for aggregates in earlier iterations of the London Plan. Since the publication of these earlier drafts of the London Plan, the Council and the GLA have reached an agreement that none of the sites originally identified in Ealing would be suitable for working during the plan period. Accordingly, any specific reference to Ealing was removed from the adopted London Plan.

8.2 Policy 1.2(j) of the Development Strategy [EAL2] recognises the need to contribute where possible to the supply of land won aggregates, however this should not be at the expense of other environmental factors.

8.3 Of those sites which to date have been identified in Ealing as having unworked reserves, none were considered suitable for mineral workings because of their heritage and open space status.

8.4 This was a position supported by the GLA, who had previously objected to their workings as part of an earlier round of consultation on the Development Strategy/Sites DPD (at Issues and Options stage).

8.5 Should alternative sites be identified during the plan period then policy 1.2(j) as worded does not preclude their workings, subject to any such proposal not conflicting with other policy matters.

9. Flood Risk

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?

9.1 Whilst it is true that only some sites fall within areas of higher flood risk, i.e. flood zones 2, 3 and 3b, all sites fall within a flood zone, whether that is zone 1 or zone 3. In this regard then consideration should be given to the
need to undertake a sequential test for all sites. The purpose of the policy as worded then, is to ensure that consideration is given in the first instance. In practice however, it is acknowledged that the application of the sequential test is only really necessary where a non-compatible use is proposed within a higher risk zone, i.e. zones 2 or 3.

10. Sustainable Infrastructure

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?

10.1 Maps 9 and 10 contained in Chapter 6 of the Core Strategy [EAL2] are based on the updated Infrastructure Delivery Plan [IDP] [EB25] published in July 2011, version 2, which form part of the evidence base documents. They do not therefore affect the soundness and effectiveness of the policies in Chapter 6.

10.2 Recommend amend footnote 88 of Development (Core) Strategy [EAL2] to state, for any future updates to mapping. Please refer to the latest version of the Infrastructure Delivery Plan [IDP] [EB25].

10.3 In response to points raised by representor 185 in their written statement on Matter 4, please see the response in Council’s Written Statement LPA11 ‘Public Services, Retail and Employment Uses’ paragraphs 5.1 and 5.2.

11. Conclusions

11.1 Only two changes are identified above. The changes/amendments regard the meaning of decentralised energy and the footnote of 88 of the Development (Core) Strategy [EAL2].

11.2 Although a reference is already included to the Heat Mapping Study [EB18], a definition could be included in a proposed “Glossary”.

11.3 In addition, an amendment is recommended for footnote 88 of the Development (Core) Strategy [EAL2] to state, for any future updates to mapping.