



Response to the Ealing Local Development Framework Proposals

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www.ealingtransition.org.uk

Response to the Ealing Local Development Framework Proposals

Dear Sir / Madam

We are writing on behalf of Ealing Transition in respect of the Local Development Framework.

Ealing Transition is a community initiative set up in 2009 to act as a focal point for action on Climate Change and Peak Oil.

This document has been submitted for comments to, and has been approved by, our 200+ members. It will lay out our concerns then make some constructive suggestions as to how the LDF might be amended.

Summary Concerns

Our concerns centre chiefly on the absence of practical measures for the mitigation of climate change and peak oil. The LDF does not appear to consider energy - both the production and conservation of energy – as a planning issue. This means that it is inconsistent with both UK Government policy and the London Plan.

Directly related to this, we believe that the assumptions upon which the report is based ('growth') are not sufficiently substantiated, and too narrow in focus.

Further, we feel that the document does not represent a 'vision' for the borough in 2026, rather that it is a statement of the present.

Finally, we are concerned that the complexity and length of the LDF document make a meaningful public consultation very difficult.

Climate Change and Peak Oil as a Planning Paradigm

Following the passing of the Climate Change Bill, the ambition to reduce greenhouse gas emissions by 80% by 2050 is now the law of the land. Despite the prominence given to a small number of climate change deniers, the science of global warming is now beyond doubt.

Data provided by oil industry geologists and economists indicates that globally we are approaching or indeed have probably reached the point of Peak Oil, the point of the maximum possible extraction rate of oil. This does not mean oil will run out, rather that supplies will increasingly reduce whilst demand increases. The result will be significant price instability and inexorable increases in the costs of energy. We have seen the beginnings of this with the oil price spike last year when oil reached \$140 per barrel, and earlier during the 2000 UK tanker drivers' strike, which paralysed the country in days and left us on the brink of serious food shortages. All other forms of fossil fuel will be affected by this rise, as oil costs form a significant element in their production and use and demand for them will further increase.

Our economy depends on highly industrialized, energy-dependent processes for producing our food and manufactured goods, and on the worldwide transport systems to deliver these. All these systems are hugely dependent on energy inputs, primarily oil. Oil is uniquely flexible as a fuel particularly for transport and as a feedstock for pesticides and plastics and much, much more.

The significance of this growing cost of oil will be enormous. It will profoundly affect our economy, our patterns of employment, our access to transport, the cost of domestic energy for heating and not least, our food security. When oil costs increase, it will impact heavily and immediately on our community. We need to plan now in order to create local resilience to be able to cope with the coming dramatic changes.

The realities are spelt out not only by Oil Industry Experts and Economists (see appendix) but by the House of Commons All Party Group on Peak Oil & Climate Change (www.appgopo.org.uk)

Consequences for the LDF

We believe that there is much of value in the document but that it fails to acknowledge the major strategic issues of our day - climate change and peak oil - as elaborated. By 2026 Peak Oil and Climate Change will impact every area of activity in the borough, from housing to food, transport and employment.

Elements of the plan such as flood defence, a 100% waste/recycling policy and a 'centralised energy facility' seem to acknowledge these strategic realities, however without any substantial supporting detail, nor the preceding strategic justification for these initiatives.

The LDF appears to assume that energy costs / supplies will remain broadly the same as they are now.

The paradigms elaborated above call into question the sense of embarking on significant energy-intensive projects such as building very tall buildings in central Ealing, irrespective of whether or not these are believed to be 'right' for the borough. Future energy scarcity rather suggests a period of consolidation of the existing building stock.

We also note that the assumptions that underpin the report appear to date back to before the recession. The LDF's narrow focus on population growth in the borough over the last ten years may

well be a function of the housing boom, and may well go into reverse as migrant workers return home. In the medium term, renewed emphasis on small-scale farming will result in a migration *away* from the cities.

It is not clear what the projected 109,000 new jobs forecast by the LDF will comprise.

Finally, the LDF does not explore the implications of a national target for carbon emissions. Harrogate, by way of an example, has set itself the target of reducing emissions by 40% by 2020.

Specific Considerations

1. Energy / Housing

As far as energy is concerned, we feel that two major areas are notably absent from the LDF. The first of these is a policy on existing housing stock and the need identified in the London Plan to reduce energy use in existing buildings. Whilst new national planning laws for new buildings are already being reflected positively in e.g. proposals for the Green Man Estate, the vast majority of Ealing's housing stock comprises draughty Victorian / Edwardian properties.

The second is an explicit plan regarding decentralised and renewable energy provision, also identified in the London Plan.

2. Food Security

We believe that the LDF should undertake to explore local food growing capacity, either in respect of the Borough's own needs or in partnership with neighbouring West London and London-fringe authorities.

Land and related local transport links should be identified, where intensive fossil-fuel-free horticulture and agriculture can ensure food supplies for this community. The strategy might also explore enabling the development of Community Supported Agriculture (CSA) where producers and consumers are partners in ensuring secure local food needs.

(Achieving this is far from unrealistic. Cuba suffered a 70% loss of oil supplies almost overnight in the 1990s when its key supplier, the Soviet Union collapsed. Cuba responded by creating localised intensive organic market gardens many run by local communities. Havana, a far from 'green' city, now grows over 80% of its fruit & vegetables within the city limits and Cuba is now a major exporter of organic fertilizers).

Strategic food security planning will need to include not just land use and transport planning, but also re-skilling and re-educating the workforce and the community to undertake the new local jobs in food production, distribution and processing. The LDF needs to plan for the infrastructure needs for this re-skilling combined with integrating skills development within the local education system.

Preservation of existing open space and growing space, whether public or privately owned, should now become a priority. Specifically there should be no loss of open space in Gunnersbury Park to

housing and commercial development. The practice of paving over gardens should be stopped for environmental and food security reasons through planning regulation.

Planning requirements should also be considered whereby new developments should be required not only to produce energy on site but also grow a proportion of their food, harvest rainwater etc.

3. Employment

The LDF can help shape a future for Ealing by helping create a much more self-reliant and localised economy. Local food production and local trade could create many new employment opportunities. The high cost of fossil energy will eventually make it cheaper to undertake many jobs manually and provide opportunity for meaningful work and craftsmanship. Repairing, maintaining, re-using and re-cycling manufactured goods will again become necessary and a source of employment. Re-skilling will again be crucial in enabling these opportunities to convert to employment.

Retailing is likely to undergo radical change. The LDF should ensure that future planning does not lock Ealing into an outmoded economic model and ensures that plans for retail are congruent with a more localised, lower energy, role. The LDF plans should enable the development of locally-based retail linked more explicitly to local producers to ensure viability in a low energy future.

4. Transport

With high oil costs, we will be far more reliant on public transport as car use becomes increasingly unaffordable. Transport links need to be sufficiently comprehensive to enable the move away from car use and ownership. The use of bicycles should be encouraged according to continental models.

5. Waste

Currently food waste from the borough is transported to a site in Bedford to be anaerobically digested. Whilst the councils/West London Waste Authorities decision to adopt this technology should be commended, the transportation of a valuable renewable energy feedstock out of the borough should be viewed as a short-term strategy. The adoption of micro scale anaerobic digesters to generate electricity on both new and existing housing developments should be considered as a longer term aim.

The LDF as a Vision

Corporate / consultancy textbooks define the role of a vision, whether that is an organisational or a brand vision, as being to:

1. Bring focus and clarity to the desired future of the business (and what makes it distinctive)
2. Inspire people to work towards that future
3. Guide people in their decision-making as they reach for this future

With this in mind, our concern is that the LDF does not spell out a compelling 'vision' of the kind of life we might want to be living in 2026. There is no predictive element regarding the shape of the

world in 2026, the impact of new technologies etc, despite the wide availability of such reports (see e.g. Henley Centre)

All of this makes it difficult for those reading the report to imagine a future Ealing. Making the borough 'an attractive place to live and work at the heart of west London' merely articulates present realities.

The London Plan's rallying cry - 'lean, clean, green'- whilst not a vision as such, is certainly a catchy articulation of intent, and one which will motivate and inspire.

Based on feedback from our members, there is no doubt that the length and complexity of the LDF is deterring people from engaging with it meaningfully.

Towards a New Strategic Framework

We believe that any plan for Ealing in 2026 should acknowledge that by 2026 energy will be more scarce, and more expensive. Further, it should acknowledge that a major programme of carbon reduction is likely to be in place by this point.

The strategic questions that any report facing up to life in 2026 should be addressing are as follows.

How will Ealing meet its energy needs in 2026?

How can Ealing make dramatic reductions to its carbon footprint in line with government targets, in particular in respect of housing and transport?

How will Ealing ensure it has access to healthy, nutritious, seasonal food in 2026 without incurring a significant carbon footprint? What proportion of its own food could Ealing produce?

How will Ealing house and provide employment for its population in 2026?

What kinds of local infrastructure, public spaces etc need to be in place to cope with the realities of life in 2026?

A Vision

A 'Vision' for Ealing might look as follows (the numbers are for illustrative purposes only but are in the logic of similar reports which address the implications of the Government's 2050 climate targets).

To set the standard as the premier urban space in the UK (*the Green Queen of the Suburbs?*) by 2026, by

Leading the way in Energy Descent planning, including a reduction in carbon emissions of (e.g. – as per Harrogate) 40% by 2020

Producing (e.g.) 50% of our own fruit and vegetables

Producing (e.g. as per the London plan) 25% of our own energy and reducing our energy consumption by 50 % by retro-fitting existing buildings

Reducing car usage by 50 %, encouraging car clubs, making 30% of the borough's streets car free, introducing dedicated arterial cycling routes, improving public transport

Creating 33,000 green-collar jobs (say, 30% of the 109,000 new jobs forecast by the LDF)

Creating a sense of community, and building the skills and resilience to deal with future challenges

Steps to Get us There

A series of practical first steps might look as follows

A local audit / census, with the dual aim of assessing the borough's housing stock for energy conservation measures and gaining more accurate population data to enable better planning

An audit of the borough's green space including public and private land, with the aim of assessing how much of this could be turned over to food production.

Setting up an energy task force to assess the possible contribution Ealing could make to its own energy provision in line with the London Plan. Consideration of e.g. methane production from sewage, CHP, solar etc

A programme of planting fruit and nut trees such as that carried out already by Manchester

Facilitating and encouraging new 'green collar' jobs. Possibly Ealing council could act as a broker / facilitator for residents who want to prepare their homes for a low-energy future.

Developing a sustainability taskforce comprising representatives of all parties and local community groups.

Putting in place a genuine consultative framework and encouraging community involvement in all of the above

Summary and Conclusions

The LDF is a fantastic opportunity to offer a vision, rather than a justification for present developments, based on 'business- as-usual' assumptions. In this respect, we believe that the role of Planning has never been more important than it is now.

Ealing Transition will be initiating projects within the community to address the issues we have discussed above in forthcoming months. It goes without saying that to see the above acknowledged in the Local Development Framework would give a major boost to our efforts, and we would be very happy to work with yourselves to take these ideas forward.

About Ealing Transition

Ealing Transition Initiative (ETI) is a local community response to the concerns and challenges arising from impending Peak Oil, with its resultant increasing costs of energy, and the impact of Climate Change. ETI is part of the worldwide Transition Towns movement which aims:-

- To spread awareness of peak oil and climate change, and motivate people to change accordingly.
- To describe a low energy future and plan how to get there.
- To help build Ealing's self-reliance in areas such as food, energy, jobs, community and economy.
- To act as a focal point / hub for the people of Ealing to exchange ideas and skills

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