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Executive Summary of Findings

Sd3 Ltd has been working with the London Borough of Ealing since 2001 on developing and implementing a methodology to assess the sustainability of Ealing’s replacement UDP, also known as ‘The New Plan for the Environment’. During this time the legislative context for sustainability assessment and the English planning system have changed so that the UDP be published as a ‘saved’ document under the interim arrangements of Planning and Compulsory Purchase Act which became law in 2004.

During Sd3’s six stages of appraisal planning policies were compared against each of 25 sustainability objectives previously devised to cover environmental, social and economic agendas. For each assessment a score between -3 and +3 was given depending on how aligned the policy was with the objective. Where policy and objective were not related no score was given. This appraisal process was carried out iteratively as the UDP progressed whenever material changes to policies were introduced.

Throughout this process Sd3 also recorded the rationale for the scores, collating these and feeding them back to Ealing to highlight where policy was well aligned with sustainability and indicating where and how improvements could be made. In general Sd3 found sustainability to be well embedded in Ealing’s strategic planning and the Strategic Planning Team was responsive to scores and comments. It was noticeable that over the iterations there were fewer low scores and more top scores, however there is still potential for greater alignment within the constraints of other pressures.
1. Introduction

This document summarises the results of the Sustainability Appraisal (SA) process for the London Borough of Ealing’s (Ealing) Unitary Development Plan (UDP) also known as the ‘New Plan for the Environment’. To reach this point Sd3 worked with Ealing for over four years since the UDP’s initial stages. This introduction section describes the context for the SA and its links to Strategic Environmental Assessment (SEA). The processes used in SA are described in Section 2. This is followed by a chapter by chapter discussion of the SA’s findings as it relates to Ealing’s nine policy (chapter) areas. To conclude, the Report recommends ways forward for Ealing as the UDP processes intersects with change in the English planning system.

The Legislative Context and Ealing’s Objectives

Since Ealing’s last UDP (Plan for the Environment) was adopted in 1998 a significant legislative shift has occurred in the English planning system. Of prime importance is the enactment in 2004 of EU Directive, 2001/42/EC, which formalised the requirement for Strategic Environmental Assessment (SEA). SEA is a framework of decision making and monitoring processes designed to ensure environmental impacts are considered when developing policy and programmes. National Planning Policy Guidance (PPG 12 and PPS 12) already expects local authorities to undertake the sustainability appraisal of plans (including the discussion of environmental impacts together with social and economic impacts). These overlapping but different requirements have resulted in a prolonged period when Government advice on how the environmental, social and economic impacts of policy are to be analysed has been unclear. As of October 2004 this period is drawing to a close with final SA/ SEA Guidance out for public consultation. As Ealing’s replacement UDP was developed during this period of instability, a pragmatic approach to the SA process has been used based on developing best practice and established SA principles. One result of this is that while overall Ealing’s SA process is clearly aligned with Governmental requirements, early stages accord less well. The impact of this will be discussed further in our recommendations.

In addition to the shifting SA requirements; during the UDP revision process the UK Government has reformed the English strategic plan making system. Simply put, this replaces UDPs with a suite of documents and plans which can give more flexible responses to changes in land use needs. This “Local Development Framework (LDF)” system has been enacted by the Planning and Compulsory Purchase Act 2004. Ealing’s UDP on adoption will become a ‘Saved Plan’ with a replacement Development Plan Document (DPD) required (by agreement with Government) within three years.

2. Summary Process Description

Ealing’s last adopted UDP dated from 1998, and needed revision and modernisation. In line with Government Guidance, Ealing began the UDP replacement process in 2001 by a root and branch assessment of the impact of planning policy on the sustainable development of the Borough. To achieve this,
sustainability consultants, Sd3 Ltd, were brought in to provide expert advice. The briefs agreed amounted to six stages:

a. To develop an agreed set of sustainability objectives for Ealing against which the UDP policy statements could be tested.

b. To draft new UDP policy statements taking sustainability into consideration.

c. To carry out SA of the 1st deposit policy statements against the agreed set of sustainability objectives.

d. To carry out SA of the 2nd deposit policy statements against the agreed set of sustainability objectives.

e. To carry out SA of the impact of the Ealing’s Supplementary Planning Guidance (SPGs) on the UDP policies.

f. To carry out SA of the significant changes to policy statements post public-inquiry (proposed modifications) against the agreed set of sustainability objectives.

It was initially envisaged that a further phase of SA would be needed if; after placing the proposed modifications on deposit and having received objections/representations; Ealing agreed to make material changes. However, as only non-material changes were recommended, this phase was unnecessary.

These stages are set out in full below.

**Timetable for UDP and Sustainability Appraisal Procedures 2001-2004**

<table>
<thead>
<tr>
<th>Date</th>
<th>UDP Process</th>
<th>Sustainability Appraisal (SA) Process</th>
<th>Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 2001</td>
<td>Public participation on updated UDP issues</td>
<td></td>
<td>Issues papers ‘Towards a new Plan for the Environment’</td>
</tr>
<tr>
<td>July 2001</td>
<td>Sd3 with Planning Policy and Agenda 21 teams developed sustainability objectives</td>
<td>25 sustainability objectives accepted</td>
<td></td>
</tr>
<tr>
<td>October 2001</td>
<td>Consultation on policy statements</td>
<td>Sd3 collated responses to the consultation for use by Ealing</td>
<td>Report on the views expressed and the consequences for the plan</td>
</tr>
<tr>
<td>Jan 2002</td>
<td>First deposit draft appraised against 25 sustainability objectives prior to going ‘on deposit’.</td>
<td></td>
<td>Comments on results fed back into policy development</td>
</tr>
<tr>
<td>February 2002</td>
<td>New draft plan ‘on first deposit’</td>
<td></td>
<td>6 week period for people to object or make representations</td>
</tr>
<tr>
<td>Date</td>
<td>Event Description</td>
<td>Details</td>
<td></td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>April - June 2002</td>
<td>Report responding to objections received at first deposit</td>
<td>Council reports on the ‘first deposit’</td>
<td></td>
</tr>
<tr>
<td>Sept 2002</td>
<td>Report on further consideration of objections</td>
<td>Sd3 reappraised changes made to create a second deposit draft in October 2002</td>
<td>Report on progress in resolving objections, and changes to the plan following due consideration</td>
</tr>
<tr>
<td>October 2002</td>
<td>Second Deposit Period</td>
<td>Second 6 week deposit period incorporating new alterations arising from the September '02 Report</td>
<td></td>
</tr>
<tr>
<td>January 2003</td>
<td>Report responding to objections received at second deposit</td>
<td>Responses to the comments submitted, and arrangements for the public inquiry</td>
<td></td>
</tr>
<tr>
<td>May - Sept 2003</td>
<td>Public Inquiry into unresolved objections</td>
<td>Presentation of detailed evidence, heard by an independent inspector</td>
<td></td>
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<tr>
<td>March 2003</td>
<td>Inquiry Inspector’s Report published</td>
<td>Jan ‘04 Sd3 Appraisal of impact of SPG on UDP policies</td>
<td>Recommendations to the Council based on the evidence heard at the inquiry</td>
</tr>
<tr>
<td>May 2004</td>
<td>Report on Inspector’s findings (Proposed Modifications)</td>
<td>April ‘04 Sd3 reappraisal of post-inquiry alterations</td>
<td>Response to the Inspector’s findings, and if required, proposing modifications to the plan</td>
</tr>
<tr>
<td>May - June 2004</td>
<td>Deposit of Modifications to Plan (plus deposit of SPGs)</td>
<td>6 week period for people to state their views for and against the changes</td>
<td></td>
</tr>
<tr>
<td>22nd July 2004</td>
<td>Report to Cabinet UDP Committee</td>
<td>Report responding to objections/representations received in respect of the modifications to UDP</td>
<td></td>
</tr>
<tr>
<td>8th Sept 2004</td>
<td>Report to Cabinet Sd3 Final Report on Sustainability of UDP</td>
<td>Report responding to objections/representations received in respect of the modifications to UDP</td>
<td></td>
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<tr>
<td>UDP Committee</td>
<td>tions received in respect of the SPGs</td>
<td></td>
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<tr>
<td>----------------</td>
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<tr>
<td>21st Sept 2004</td>
<td>Report to Cabinet</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Report to Cabinet to consider UDP modifications and SPG, and report on next stages, i.e. to adopt the plan.</td>
<td></td>
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<tr>
<td>12th October 2004</td>
<td>Report to full Council</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Sd3 Final Report published alongside adopted plan</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Full Council to make formal decision on the above (i.e. to adopt the plan).</td>
<td></td>
<td></td>
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</tbody>
</table>

a. To develop an agreed set of sustainability criteria.
Ealing’s 1998 UDP, ‘Plan for the Environment’, was developed using a set of environmental criteria, as dictated by Government guidance at the time. In order to incorporate sustainable development thinking into the draft policies of the new UDP and to undertake a sustainability appraisal of the policies, the existing environmental criteria needed to be updated to take into account the three main themes of sustainable development: social, economic and environmental issues.

The criteria or objectives as they were later referred to were drafted, taking into consideration national and international approaches, Government guidance on the subject, best practice examples, as well as the previous environmental appraisal of Ealing’s UDP. The objectives also needed to be specific to the planning process and Ealing itself, and following development of a set of possible objectives, they were debated and agreed at a workshop meeting with members of the Ealing’s Planning Policy and LA21 teams.

b. Draft new UDP policy statements taking SD into consideration.
Following review work by the Planning Policy team, 10 new Issues Papers each containing approximately 10 individual policy areas were drawn together, each covering a specific area of planning. Sd3 then drafted policy statements for each of the policy areas outlined in the issues papers using information from the existing UDP and aligning the policy drafts as closely as possible to the appropriate sustainability objectives. Additionally, other supporting policy statement documents were considered.

Prior to drafting the policies, the Issues Papers had been put out for public consultation. Sd3 collated and analysed the responses to the Issues Papers specifically looking at the responses from residents, businesses, developers, and other organisations.

c. SA of policy first deposit UDP
Once the draft policy statements had been reviewed by the Planning Policy team and agreed with councillors, the policies were appraised against the sustainability objectives developed in stage a. Each policy/objective assessment was scored from +3 to -3. A positive score indicated that the policy was aligned with the objective, with +3 showing that the policy was highly supportive of the objective. A negative
score indicated that the policy did not align with the sustainability objective. A zero score indicated a conflicted or underdetermined relationship between the policy and the sustainability objective as might exist when a policy was ambiguous or whose impact was dependent on how policy was applied. Where there was no direct relationship between policy and objective a tilde (~) was used. Additionally, a brief justification for the score allocated to each assessment was provided. This information was recorded in matrix form.

Due to the often qualitative nature of sustainable development, appraisal scores and supporting justification are subjective. While this may encourage contention, the rationale of SA, is to ensure that sustainable development issues are included and recorded within policy debate and decision making process rather than establishing absolutes.

d. SA of Second Draft UDP
   This appraisal followed a similar process to that used to assess the first deposit policies against the sustainability objectives. Again matrices and comments on changes to score were prepared and presented to Ealing with recommendations for improvements to policies which would improve policy sustainability. On this and successive occasions only those policies which had been changed since the previous draft were assessed.

e. SA of Impact of Supplementary Planning Guidance on Policies
   Supplementary Guidance generally has little additional impact on the sustainability of policies. Often this is because the SPG is concerned with a specific technical matter which only impacts on particular objectives. For example SPG10 Noise and Vibration has a positive impact on Sustainability Objective 8 (Minimisation of Noise), and Objective 24 (Design Issues and Materials Sourcing) but no impact on any other objective. Even when SPGs are more broadly written eg SPG1, Sustainability Checklist, not all sustainability objectives are impacted. The scoring system for the SA of the SPG was the same as used elsewhere. On several occasions an existing +3 score was further supported by an SPG. In this case the score remained at maximum with a note of the SPG impact added to the justification.

f. SA of Post Inquiry Changes
   Following the Public Inquiry, Ealing proposed to make around 180 changes to the second deposit draft UDP. It was agreed that only those changes which would be likely have a material sustainability impact would be appraised. After discussion 68 changes to 32 policies were appraised. The revised matrices from the appraisal of the Supplementary Guidance were used at this stage.
3. Findings
Introduction
This section takes a chapter by chapter review of the sustainability appraisal of Volume One of Ealing’s UDP. This is divided into nine chapters (strategy, environmental resources and waste, green space, urban design, housing, business, shopping and town centres, community facilities, transport). Volume Two of the UDP contains site specific policies which as a manifestation of the topic based policies have not been appraised. It is important to note that SA was applied iteratively through the UDP production process so as to influence policy development. Final scores and comments are therefore an accretion of successive assessments rather than an SA of the final draft of the adopted UDP.

While findings for specific chapters are given below in general Sd3 found Ealing’s Strategic Planning team engaged with the sustainability agenda and responsive to its scores and comments. It is fair to say that over the iterations fewer low scores were given as the sustainability of policies generally increased.

Chapter 1: Strategy
Overall:
The strategic policy chapter (Part 1 of the UDP) contains 10 general policies. Policy 1.1 defines the overall tenor of the statements, while Policy 1.10 describes the practicalities by which policies will be applied. Policies 1.2 to 1.9 cover eight topic areas which introduce UDP chapters 2 to 9. The impact of these policies is therefore complex and overlaps specific policies detailed elsewhere.

Chapter 2: Environmental Resources and Waste
Overall:
The chapter demonstrates that Ealing has generally well integrated environmental aspects of sustainability into its policy development. Perhaps more significantly it also demonstrates that the economic and social aspects of sustainability are also being considered simultaneously to the better established environmental concerns.

Significant Detail:
2.3 ‘Land - Mineral Development’
- Promotes sustainable development and construction, materials recycling etc.
- Could perhaps include an understanding of economic impacts of this. E.g. costs of recycling, energy involved, life cycle impacts e.g. primary aggregates vs. recycled aggregates, fit for purpose etc.
- Few impacts due to lack of mineral resources suitable for extraction in the Borough.
2.5 'Water - Drainage, flood prevention and environment’
- Emphasise the importance of pollution control and monitoring. Good link made to Environment Agency in “Partnerships”.
- Use links to private business for best practice on water conservation measures (e.g. Envirowise).
• Policy deals with water and the environment: it could stipulate some form of engagement with Thames Water (and others) in policies to manage water resources, as part of link to residential policies and others elsewhere.

2.7 'Contaminated land'
• Lack of alignment of contaminated land with waste and water quality objectives.

2.9 'Energy'
• Good advocacy of renewables here, good coverage of energy efficiency and design.
• Make links to Housing (e.g. officers responsible for HECA implementation), and possibly Energy Efficiency Best Practice Programme, and Energy Savings Trust.
• Shift to requirement for renewable energy equipment in all major developments. Significant strengthening of policy’s sustainability occurred between 1st and 2nd deposit drafts.

2.10 'Waste Minimisation and Management'
• Good to see promotion of waste minimisation advantages through an education programme.
• Scope exists to provide more on measuring to manage in business.
• Good cross-cutting sustainability impact: promoting local business in recycling etc (economic and environmental benefit).

2.11 'Waste Environmental Impact'
• Use of 'demonstrable harm' suggests need for test to be applied on decision making around policy. This shift from 'significant harm' during the Inquiry phase weakened this policy considerably.
• Policy acknowledges tension between renewable energy provision and other aspects of sustainable development at a global level- a more mature approach to understanding the compromises between different issues.

Chapter 3: Green Space and Natural Environment

Overall:
Policy addresses the main sustainability issues relating to each individual area, obviously strong on protection of areas of green space. Less strong on community involvement and addressing global issues such as protecting forests by using sustainably sourced wood.

Significant Detail:

3.7 ‘Biodiversity and Nature Conservation’
• Promotes educational facilities.
• Protects natural environments and important features thereof.
• Implies community involvement in nature study programmes - this could be emphasised.
• Strengthen protection and formalised management processes introduced during Inquiry stage.

3.2 & 3.7
• Safety and security of users of green corridors/ waterways and of cemeteries should be considered.
Chapter 4: Urban Design
Overall:
Thorough inclusion of sustainability issues, particularly in design of buildings, weakest on green business, global issues and the inclusion of partners within design processes.
Detail:
4.1 ‘Design of Development’
• Good alignment with most sustainability objectives.
• Commitment to principles of sustainability however no mention of sustainably sourced or ecologically sound materials, only re-cycled. Inclusion of importance of sustainably forested timber, non-toxic materials and low embodied energy materials, which contributes to non-local (i.e. point of production) and global issues (climate change, forestry) missing.
• Provides reference to design documents to facilitate sustainable design.
• Encourages giving priority to pedestrians and public transport.
4.2 ‘Mixed use’
• Acknowledgement of the tensions created by promoting mixed use not always apparent.
4.3 ‘Inclusive Design - Access for All’
• Clear and positive support.
• Could improve on community participation/involvement and emphasis on role of public transport.

Chapter 5: Housing
Overall:
Good integration of sustainability issues, particularly in residential design. Weakest overall areas are community involvement, safety and security, cultural identity and alternative energy.
Detail:
5.3 ‘Lifetime Homes and Wheelchair Housing’
• Missed opportunity to increase accessibility of public transport for disabled people. Homes are not specifically located within easy access to transport facilities.
• Missed opportunity for community participation/involvement.
5.4 ‘Range of Dwelling Sizes and Types’
• Encourages provision of local facilities and ease of access.
• Encourages partnerships with the private sector.
• Implied promotion of mixed use.
5.6 ‘Small Dwellings and flats’
• Tension between creating comparatively resource inefficient small units and larger ones not acknowledged.

Chapter 6: Business
Overall:
Development in specific areas is likely to increase transport and possibly congestion in areas concerned. Overall the policy should discourage road
transportation to these areas. Environmental issues affecting business areas, such as recycling, waste reduction, energy or water conservation, are weakly developed. Green business clubs which could act as catalysts for this development and similar initiatives to encourage greater co-operation and sharing of best practice between local businesses are absent. Weak on community and other social issues.

Detail:

6.1 'Supply of Land and Property for Business Use'
- Strong emphasis on economic factors, regeneration, employment and mixed use.
- Weak on issues such as access for all, community involvement and the environment.

6.2 'Proposals for Office Development'
- Strong emphasis on mixed use.
- Clear promotion of sustainable transport.
- Maintenance of character of area.

6.3 'Alternative Development of Office Buildings'
- Emphasis on re-use of existing buildings.
- Implies increased employment/ new business opportunities.

6.4 'Industry and Warehousing in Major Employment Locations'
- Strong on economic, regeneration and mixed use.
- Explicit reference to rail and canal, and potential to maximise public transport.

6.5 'Ancillary Development in Major Employment Locations'
- Addresses access for all.
- Promotes the sharing of community services and facilities including green and open spaces.
- Positive promotion of joint security initiatives.
- Reference to sponsorship is not sufficient for partnership, sponsorship implies a one way relationship, providing money but no input therefore more emphasis on partnerships needed.

6.6 'Workspace for Artistic and Cultural Activities'
- Building design issues are particularly important for the diverse needs of cultural development e.g. high levels of natural light for artist studios.

6.7 'Hotel Development'
- No reference to "Accessible Ealing" this needs to extend to hotels.
- An excess of transient people can have a detrimental effect on the community, therefore consideration needs to be given to over-development in any one area.

Chapter 7: Shopping and Town Centres

Overall:

More integration between the three strands of sustainable development could be introduced, e.g. business and planning process and promoting basic areas of environmental management and cost savings. There is a good focus on local shops as services for the community however the chapter could include more on communities and local supply chains.

Detail:
7.1 ‘Promoting and Enhancing a Network of Centres and Promoting Key Sites’
- Good coverage of accessibility and laying the foundations for an appropriate and evolving shopping network for Ealing.
- Policy emphasis on diversity in character of shopping areas.
- Greater intensification of shopping at larger areas infers greater need to travel and reduced score for this policy against 'Mixed use/reduce need to travel' objective.
- Increase in retail space implies greater employment opportunities.
- Intensification of usage of major centres will impact on the amount and usage of open space found there. The direction of impact is dependent on how intensification takes place. Safeguarding/creation of open space near areas of intensification should be made implicit.

7.2 ‘New Shopping Development and the Sequential Approach’
- Public transport promotion is good.
- Significant changes in policy sustainability.
- Increase in retail space implies greater employment opportunities.
- Intensification of usage of major centres will impact on the amount and usage of open space found there. The direction of impact is dependent on how intensification takes place. Safeguarding/creation of open space near areas of intensification should be made implicit.
- The application of the Sequential test suggests land use intensification at centre increasing the score for this policy against the 'Reuse of vacant and under-used land and buildings' objective.
- Revised policy addresses previous weak scores for 'Design issues and material sourcing' objective by discussing scale and integration with existing urban character.

7.3 ‘Designated Shopping Frontages’
- Community input could be improved.

7.4 ‘Non-Designated Shopping Frontages’
- The policy contributes to enhancing the well-being and attractiveness in general but is not proactive in contributing to realising sustainable development using the planning process.

7.5 ‘Basic Shopping Needs’
- Social aspects of sustainable development are maintained in this section.

7.6 ‘Eating, drinking and entertainment’
- Good promotion of social impacts and amenity value.

7.7 ‘Other Shopping Centre Uses & 7.8 Markets and Street Trading’
- Policies are good on promoting economic and environmental sustainability in general but greater mutual benefit could be obtained by encouraging co-operative efforts and best practices.
- Communities benefit from such trade and the policy is well placed to enhance the activities of this type of trading e.g. farmers’ markets.

Chapter 8: Community Facilities
Overall:
The chapter covers sustainable development and land use planning for community facilities relatively well. There are however a number of weaknesses. These relate principally to loss of cohesion within and between policies.

**Detail:**

8.1, 8.2, 8.3 ‘Existing, New and Redundant Community facilities’
- These policies show a lack of cohesion. Although strong on the concept of accessibility for all, there is a lack of provision for community participation in the objectives of the policies.
- Policy 8.2 strengthening between 1st and 2nd draft by providing advice on including communities in practice.
- The statement of social impacts required from developers lacks follow-through e.g. by verification.
- Clearer, stronger, more positive links should be made to environmental aspects of design and build of refurbished existing facilities and new-build facilities (by developers for example).

8.4 ‘Large Scale Community Facility Development’
- This section is satisfactory in areas of accessibility, mixed use, and wider economic impacts in Ealing and surrounding areas.

8.6, 8.7, 8.8
- Generally strong policies especially on accessibility, safety and working in partnerships to deliver services and solutions.
- Also is there scope to refer to environmental management and design best practice opportunities in providing facilities (refurbishment, materials used, energy control etc).
- Use of ‘net loss of useable areas’ gives weaker protection of green space in policy 8.8.

**Chapter 9: Transport**

**Overall:**

Addresses the main sustainability issues relating to transport but is weak on noise issues.

**Detail:**

9.1 ‘Development, Access and Parking’
- Accessibility moved to the fore in policy at 2nd draft.
- Good discussion on car clubs; working with developers/TFL in enhancing public transport.
- Prominence of security of cycle parking good.

9.2 ‘Stations and Interchanges’
- Positive approach to improving air quality through encouraging cleaner fuels;
- Positive towards mixed use and effects on safety and security.
- Strong on accessibility.
- Good emphasis on working with TFL & transport operators.

9.3 ‘Major Transport Projects’
- Consider and promote landscaping and nature conservation initiatives.

9.4 ‘Buses’
• Promotes bus use but alternative fuels would diminish the implied increase in pollution.
• Implied improvements in safety for passengers.
9.5 'Walking and Streetscape'
• Supports mixed use and access for all.
• Missed opportunity for community involvement e.g. walking buses for schools.
9.6 'Cycling'
• Encourages safe routes and improved facilities.
9.7 'Accessible Transport'
• Encourages community involvement and partnerships.
9.8 'Low Car Housing & City Car Clubs'
• Positively contributes to improved local air quality by reducing the number of vehicles regularly parking.
• Encourages car sharing but need guidance on how this is to be done.
9.10 'Freight'
• Restricting hours of operation positive against disturbance from noise.

SA of Ealing’s Supplementary Planning Guidance
The impact of Supplementary Guidance on the sustainability of the main New Plan for the Environment is subtle but extremely important in influencing the application of policy and interpreting it for the layman. It would be easy to assume that a 0 score for an impact of a SPG against a sustainability objective for a policy as a failure to increase the sustainability of policy. This would be wrong as in many instances policy is already sustainable and the SPG serves a different role e.g. clarification which does not in itself impact on policy sustainability.

Detail:
Areas where the impact of SPG on policies was seen to be negative are few, however the following are noteworthy:

SPG 2 / Policy 2.5 'Water, Drainage Flood Risk and Development'
The content of the SPG has a negative impact on the ‘global issues’ sustainability objective for two reasons. The SPG did not place sufficient regard on the impact that large or small wetland habitat restoration could have in minimising the impact of floods nor discussed the likely increase in severe weather events due to climate change and the increasing likelihood of low frequency, high-risk flood events.

SPG 7 / Policy 4.3 'Accessible Ealing'
There was a negative impact of this SPG on 2 of the 25 sustainability objectives - 'Reduction in waste/recycling' and 'Promoting public transport'. There is a tension between across the board increase in resource usage to ensure accessibility up to the 'Lifetime Homes Standards' and the specific level of need for increased domestic accessibility. That is to say there may be an increased waste if resources are not targeted to specific need. The SPG is also weak on design for accessibility using public transport compared to information on car parking.

SPG 13 / Policy 5.5 'Residential Design'
For the Nature conservation/habitats/biodiversity objective a negative (+2 down to +1) was given as there was no mention of native habitats or planting
SPG 18 / Policy 7.6 ‘Places for Eating Drinking & Entertainment’
The 'Mixed use/reduce need to travel objective’ was marked down (+2 to +1) as
this SG will bring about a concentration of these uses in a few locations thereby
increasing the need to travel, eat, and drink, and for entertainment

4. Recommendations
As mentioned previously the SA approach used for Ealing’s UDP has evolved within
a changing planning system. With the shift from the UDP based planning system to
the Local Development Framework (LDF) an opportunity now exists over the next
three years for Ealing to revisit its planning policies and align its decision processes
to fully accord with final Government guidance on Sustainability Appraisal.
Specifically Ealing will need to consider:

Sustainability Objectives
Since Ealing’s sustainability objectives were devised Government Guidance on the
topics which should be covered and their role has become available. The current
sustainability objectives should be checked against this advice and potentially
reformulated to be outcome focussed. They will also need to be scrutinised to
ensure they are an appropriate basis from which targets can be developed and
performance monitored.

Evidence Base
To ensure that programme and plan performance can be assessed an evidence base
for each objective is required to be established. The evidence may come from a
variety of sources (including internal ones) and may change over time as
monitoring systems become established.

Monitoring system
Working in conjunction with the providers of material for the evidence base a
system to record the indicators behind the objectives must be established. This
will be used to understand performance against targets and what remedial actions
may need to be taken.

Sustainability Options.
The development of policies which optimise alignment with the sustainability
objectives requires that all policy options be considered prior to decision making.
By so doing the ‘soundness’ of decision making (a key element in the LDF system)
may be demonstrated. The sustainability appraisal of options plays a significant
part in narrowing down to a preferred option which becomes final policy. The
recording of SA of options also has an important role in reshaping policy when
monitoring of policy performance suggests policy amendment is needed.
# Appendix 1, Ealing’s Sustainability Objectives

<table>
<thead>
<tr>
<th>Type</th>
<th>Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Social</td>
<td>Encourage the provision of <strong>equitable access</strong> to essential facilities, e.g. affordable housing and local services such as shops, transport, green space, recycling facilities, doctor etc. and encourage pushchair and wheelchair access for people with children or physical and other disabilities.</td>
</tr>
<tr>
<td>2. Social</td>
<td>Encourage <strong>community involvement</strong> in initiatives, e.g. community safety projects, consultation exercises etc., in order to <strong>empower</strong> all sections of the community, both individuals and groups, in decision making regarding issues having both social and community impacts, particularly taking the community views on board prior to commencing projects. Exhibit support and <strong>value unpaid and voluntary work</strong> and encourage community projects such as LETS schemes.</td>
</tr>
<tr>
<td>3. Social/Economic</td>
<td>Actively encourage <strong>partnerships</strong> with schools, local and other businesses, and other constituent parts of the local community such as faith communities, societies, as well as other government agencies etc.</td>
</tr>
<tr>
<td>4. Social/Cultural</td>
<td>Preserve and enhance the amount of <strong>designated land and buildings</strong> e.g. conservation areas and listed buildings which represent the cultural heritage for the next generations including areas of archaeological interest.</td>
</tr>
<tr>
<td>5. Social/Cultural</td>
<td>Enhance the <strong>cultural identity</strong> of the local community, encouraging the cultural, artistic and recreational activities of the local community.</td>
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<tr>
<td>6. Social</td>
<td>Preserve and encourage <strong>mixed use</strong>, whilst retaining a balance of the residential and industrial/business needs of the area. Enhance the range of local facilities, reducing <strong>the need to travel</strong>, particularly the number of trips and distance travelled in private motorised vehicles.</td>
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<tr>
<td>7. Social</td>
<td>Actively ensure that developments or changes in use minimise the opportunities for crime and antisocial activities and promote a sense of <strong>safety and security</strong> amongst residents.</td>
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<tr>
<td>8. Environment</td>
<td>Encourage the <strong>minimisation of noise</strong> nuisance from neighbours, traffic, aircraft and other activities.</td>
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<td>10. Economic</td>
<td>Promote <strong>local paid employment</strong> and encourage the purchasing and provision of local goods and services, and the increased local circulation of money.</td>
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<tr>
<td>11.</td>
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<td>12.</td>
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<td>16.</td>
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<td>17.</td>
<td>Social/environment</td>
</tr>
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<td>18.</td>
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<td>21.</td>
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<tr>
<td>23.</td>
<td>Environment/Economic</td>
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<td>All</td>
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<td>25.</td>
<td>Environment</td>
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</table>
Appendix 2, Sustainability Appraisal Matrices

See appraisal matrices for each chapter appended separately.