

**Ealing Council**

# Ealing Local Plan Integrated Impact Assessment

## Ealing Local Plan Integrated Impact Assessment

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**Ove Arup & Partners Limited**  
8 Fitzroy Street  
London  
W1T 4BJ  
United Kingdom  
[arup.com](http://arup.com)

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# 1. Introduction

The Ealing Local Plan provides a framework for development within Ealing for the next 15 years. As part of the preparation of the Local Plan, an Integrated Impact Assessment (IIA) has been carried out. This report describes the IIA process and sets out the results of the assessment.

This section gives an overview of the IIA including scoping. In section 2, the individual methodologies for each of the constituent assessments making up the IIA are presented. Section 3 focuses on the Equalities Impact Assessment and Section 4, the assessment in accordance with the Habitats Regulations.

## 1.1 Integrated Impact Assessment

The Integrated Impact Assessment process promotes sustainable development, health and equality through better integration of social, environmental and economic considerations into the development of the spatial options, policies and site allocations that form the Local Plan.

The IIA draws together the following assessments:

- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA);
- Health Impact Assessment (HIA); and
- Equality Impact Assessment (EqIA)

A Habitats Regulation Assessment (HRA) has also been prepared separately.

This report comprises the Interim IIA Report that is delivered at the Regulation 18 consultation stage, alongside a draft version of the Local Plan.

Additionally, a Non-Technical Summary (NTS) is published alongside this document, providing a high level overview of the IIA in a clear, easy-read format.

Regulation 18 of the Town and Country Planning Regulations 2012, requires the local planning authority to notify stakeholders and 'specific consultation bodies' of the Local Plan and invite them to comment on what is proposed within the plan<sup>1</sup>.

## 1.2 The Plan area

Ealing is located in west London (Figure 1). The borough comprises seven broad sub-areas, or towns, each with their own character: Acton; Ealing; Greenford; Hanwell; Northolt; Perivale; and Southall.

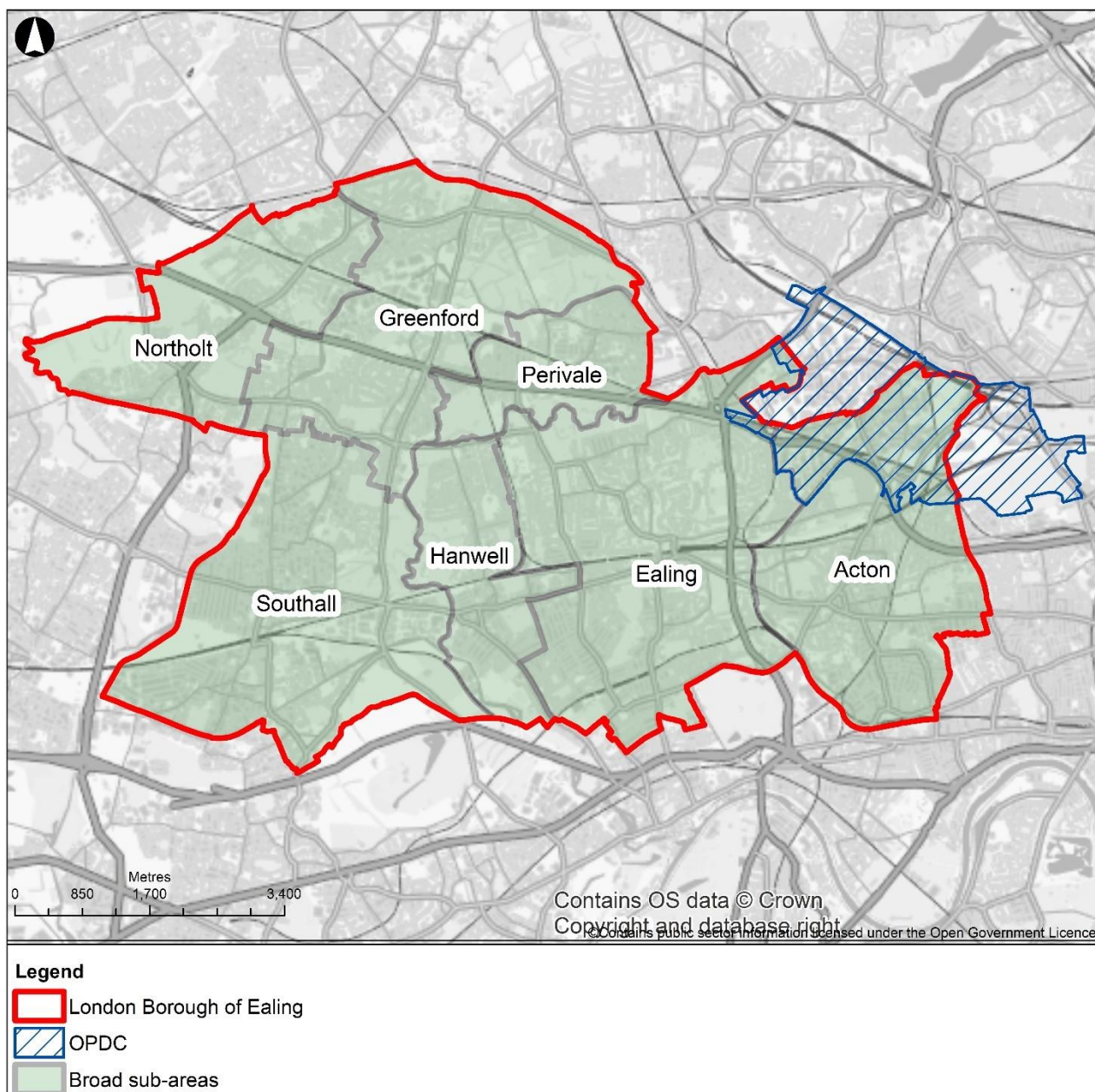
Key features of the borough include the River Brent and the Grand Union Canal and a number of green and open spaces, including Horsenden Hill, Hanger Hill and Brent River Park. An area in the east of the borough, including Park Royal and North Acton, forms part of the Old Oak and Park Royal Development Corporation (OPDC) planning area. The OPDC is the local planning authority and adopted their own Local Plan in June 2022<sup>2</sup>.

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<sup>1</sup> <https://www.legislation.gov.uk/uksi/2012/767/regulation/18>

<sup>2</sup> OPDC 2021. Local Plan. Available online at: <https://www.london.gov.uk/about-us/organisations-we-work/old-oak-and-park-royal-development-corporation-opdc/get-involved-opdc/local-plan>

Figure 1: Ealing local authority area



### 1.3 The Local Plan

Ealing Council is creating a new Local Plan, which will set out a vision and framework for the future development of the area over the next 15 years. Ealing's new Local Plan will replace Ealing Council's current suite of development plan documents, bringing together updated policies into a single plan.

The spatial vision comprises a vision statement that is supported by the spatial strategy and strategic place interventions. These components provide structure to the policies that are written at the borough-scale and town-scale which are supported by policies to manage development.

The spatial strategy incorporates the three strategic objectives of tackling the climate crisis, fighting inequality and creating good jobs and growth. These objectives provide a specific local response to the London Plan that guides future growth and planning policy and provide core themes that run through the subsequent town plans.

The town policies will support the Local Plan in maximising the role and responsibility of each of the seven towns in Ealing. The policies will help guide future investment within the towns so that development is equitable and inclusive to all residents across the borough.

The role of development management policies is to be the mechanism through which the three overarching strategic objectives will be implemented. The development management policies largely conform to the London Plan but vary according to the local character and include wholly new policies where necessary.

## **1.4 IIA approach**

The IIA provides an assessment of the emerging Ealing Local Plan and its contribution towards achieving a range of environmental, economic, health, equality and other objectives.

The IIA tests the performance of the draft Local Plan to identify the likely significant positive and negative effects. It also assesses the effects of reasonable alternatives to inform the selection of the preferred option. Where significant adverse effects are predicted, the IIA identifies the measures required to mitigate them.

As stated above, the IIA brings together multiple assessments, each with their own legal requirements and / or guidance to adhere to and apply. The SA and HIA are fully integrated, but due to the differences in the methodological approaches (as described further below) the EqlA and HRA are more discrete assessments. Further detail on the methodology and approach for each sub-component of the IIA are described in their relevant sections.

### **1.4.1 Influencing the Local Plan**

As part of the development of the Local Plan, the IIA team have provided ongoing expert advice, regularly testing and challenging the Local Plan team during the development of options and policies. The aim of this has been to support and meaningfully contribute towards the development of an ambitious Local Plan in which sustainable principles are embedded throughout. The IIA team have contributed to workshops, reviewed early drafts of the overall vision of the plan, and attended regular meetings on the plan development. Alongside this, the assessment set out in this report describes the full range of recommendations and suggestions identified as part of the IIA process to improve and enhance the policy text and its outcomes.

### **1.4.2 Scoping Report**

An IIA Scoping Report was published in January 2022<sup>3</sup>. This stage largely comprises a review of existing information, including relevant plans and programmes and baseline information in Ealing for a range of environmental and social topics. This was used to inform the development of an assessment framework, the key output of the Scoping Report.

The Scoping Report was consulted upon in accordance with the requirements of Regulation 12 (5) of the SEA Regulations<sup>4</sup> and was issued to statutory consultation bodies (such as Natural England, Historic England and the Environment Agency) and was also publicly available for comment on the Ealing Council website.

Comments on the Scoping Report were reviewed and have been taken into account as the IIA process has continued. A summary of the consultation responses received and an outline of how these have been addressed is set out in Appendix A of this document. A number of comments have been incorporated into the updated baseline (0) and updated review of relevant plans and policies (Appendix C).

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<sup>3</sup> Ealing Council 2022. Integrated Impact Assessment (IIA) Scoping Report for new Local Plan.  
[https://www.ealing.gov.uk/download/downloads/id/17169/integrated\\_impact\\_assessment\\_scoping\\_report.pdf](https://www.ealing.gov.uk/download/downloads/id/17169/integrated_impact_assessment_scoping_report.pdf)

<sup>4</sup> <https://www.legislation.gov.uk/uksi/2004/1633/regulation/12/made>



## 2. Integrated Impact Assessment Methodology and Findings

### 2.1 Introduction

This section outlines the approach to the SA / SEA and the HIA, the methodology applied to the IIA and then the findings from the assessment process (equivalent information on EqlA is presented in section 3 and HRA in section 4).

#### 2.1.1 SA / SEA approach

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are required under two separate legislations with the former (SA) encompassing the requirements of the latter (SEA):

- The Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out an SA of the local plan during its preparation. Section 39 of the Act requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development”.
- The Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as ‘the SEA Regulations’) requires an assessment of the likely significant environmental effects arising from a plan or programme.

Key guidance that informs SA/SEA includes:

- The Royal Town Planning Institute (RTPI) guidance on Strategic Environmental Assessment Improving the effectiveness and efficiency of SEA/SA for land use plans<sup>5</sup>;
- Department for Levelling Up, Housing and Communities (DLUHC) Guidance - Strategic environmental assessment and sustainability appraisal<sup>6</sup>; and
- Ministry of Housing, Communities & Local Government (MHCLG) Strategic Environmental Assessment Directive: guidance<sup>7</sup>.

#### 2.1.2 HIA approach

In terms of HIA, there is currently no statutory guidance on how to undertake an HIA. The scope, approach and methodology are driven by a range of factors including non-statutory guidance and best practice, stakeholder interests, and project or plan-specific issues, including:

- Public Health England (PHE) Health Impact Assessment in Spatial Planning<sup>8</sup> report;
- The London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Tool<sup>9</sup>; and

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<sup>5</sup> RTPI 2018. Strategic Environmental Assessment Improving the effectiveness and efficiency of SEA/SA for land use plans . Available online at: <https://www.rtpi.org.uk/research/2018/january/strategic-environmental-assessment-seasa-for-land-use-plans/>

<sup>6</sup> DLUHC 2020. Guidance - Strategic environmental assessment and sustainability appraisal. Available online at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

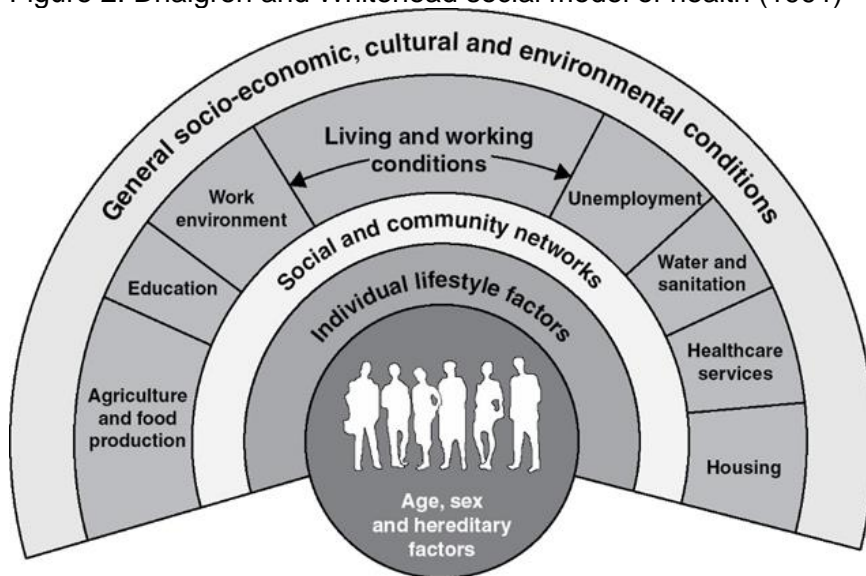
<sup>7</sup> MHCLG 2005. Strategic Environmental Assessment Directive: guidance. Available online at: <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

<sup>8</sup> Public Health England 2020. Health Impact Assessment in spatial planning. Available online at: <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

<sup>9</sup> NHS London Healthy Urban Development Unit (HUDU) 2019. Rapid Health Assessment Tool. Available online at: <https://www.healthylurbandevelopment.nhs.uk/wp-content/uploads/2019/10/HUDU-Rapid-HIA-Tool-October-2019.pdf>

- The Dahlgren and Whitehead model (Figure 2)<sup>10</sup>, which illustrates the determinants of health ranging from individual characteristics and lifestyles to wider economic, cultural, social and environmental conditions.

Figure 2: Dahlgren and Whitehead social model of health (1991)



## 2.2 IIA Methodology

The assessment stage comprises three main components:

1. Assessment of 'reasonable alternatives' of the Local Plan (Section 2.3)
2. Assessment of the draft Local Plan policies (Section 0); and
3. Assessment of site allocation (Section 2.5).

The IIA framework set out in Table 1 was established during scoping and forms the basis of assessing potential effects. The objectives are guided by appraisal questions accompanying each objective. These questions act as prompts to inform the overall assessment of the objectives but are not designed to be assessed individually. The questions included in the framework are also not exhaustive, and some are more relevant to certain Plan elements than others.

**Table 1: IIA framework**

Framework objective	Guiding questions – does the Local Plan...
1. Housing and communities: To meet current and future housing need and support the development of diverse and sustainable communities	<p>Address housing need in the borough, particularly for more vulnerable groups, such as older people?</p> <p>Deliver a range of types, tenures and affordable homes?</p> <p>Deliver adaptable and flexible housing, for example accessible homes or homes which can accommodate home working?</p> <p>Support mixed-use centres which enhance community services and amenity?</p> <p>Reduce homelessness and overcrowding?</p>
2. Economy: Build a sustainable economy that offers	<p>Develop sustainable and resilient economic centres?</p> <p>Provide a variety of employment land, such as type and location?</p>

<sup>10</sup> Dahlgren G, Whitehead M. 1991. Policies and Strategies to Promote Social Equity in Health. Stockholm, Sweden: Institute for Futures Studies.

Framework objective	Guiding questions – does the Local Plan...
employment opportunities for all	<p>Encourage flexibility to allow businesses and their employees to respond to uncertainties and changing economic conditions?</p> <p>Support more diverse businesses, particularly those owned and used by ethnic minority groups?</p> <p>Improve access to employment opportunities and minimise barriers (e.g. financial, training and qualifications, childcare)?</p> <p>Support small, start-up, local and green businesses?</p>
3. Education and skills: Improve educational attainment and skills at all levels and reduce educational inequalities	<p>Improve access to a diverse range of educational opportunities, including continuing or adult education and vocational education?</p> <p>Support training and education in skills profile reflective of the Ealing economy?</p> <p>Reduce inequalities in access to a good standard of education?</p>
4. Health: Improve mental and physical health and reduce health inequalities	<p>Make provision for new, improved or replacement healthcare facilities to ensure capacity is met for existing and future needs?</p> <p>Create an environment that promotes healthy and active lifestyles, particularly in children, through the provision and enhancement of open spaces and recreational and active travel infrastructure?</p> <p>Promote good mental health and wellbeing by supporting a range of health determinants such as good employment and education, social connectivity and high quality environments?</p> <p>Allow for adaptation and reaction to potential future health issues and major events, including episodes of extreme weather?</p>
5. Connectivity: Improve connectivity to minimise private vehicle use and promote safe and sustainable forms of transport	<p>Increase safe opportunities for active forms of transport, particularly walking and cycling?</p> <p>Ensure active travel and public transport networks are well-connected to reduce private vehicle use?</p> <p>Ensure active travel opportunities and public transport networks are available for, and reflect the needs of, all groups within the borough, including those who may be more vulnerable.</p>
6. Air quality and noise:	<p>Encourage sustainable forms of transport, such as walking, cycling and public transport?</p> <p>Encourage sustainable development which maximises energy efficiency and the use of renewable energy sources?</p> <p>Ensure good spatial planning which avoids exposing people to poor air quality and high noise levels?</p> <p>Improve people's access to quiet spaces?</p>
7. Resources and land use: Maximise efficient and sustainable use and disposal of material resources, including land	<p>Use land efficiently through the development of existing brownfield sites and / or the reuse of existing buildings?</p> <p>Ensure remediation of contaminated land at brownfield sites?</p> <p>Protect and intensify industrial land to contribute to the London economy?</p> <p>Reduce overall waste volumes through reduce and reuse initiatives, and contribute towards achieving self-sufficiency in waste management?</p>
8. Historic environment, and townscape: Protect, enhance, and promote cultural resources, including historic environment and townscape assets	<p>Protect or enhance the character of Ealing's towns and sub-areas?</p> <p>Protect, conserve or enhance the significance of historic environment assets and their setting?</p> <p>Improve and increase opportunities for people to interact and access historic environment assets and learn about the history of the borough?</p>



Framework objective	Guiding questions – does the Local Plan...
9. Biodiversity and Green Infrastructure: Protect and enhance Ealing's natural capital (habitats and species) and the benefits it provides	Protect and enhance green and blue infrastructure? Improve and increase opportunities for people to access green and natural spaces? Apply the principles of biodiversity net gain for all new development? Enhance the biodiversity potential of parks and open spaces? Develop connectivity between the network of open and green spaces across the borough?
10. Water environment: To protect the quality and quantity of water resources	Avoid development in areas at high risk of flooding? Promote the use of SuDS and other flood-resilient design measures? Safeguard water resources and support the efficient use of water, including the recycling of water, to minimise consumption? Improve water quality within Ealing's rivers and waterways? Protect groundwater and enhance groundwater quality?
11. Climate change mitigation: To help tackle climate change impacts through reducing greenhouse gas emissions and moving towards a zero-carbon borough	Help Ealing meet local and London-wide emissions targets? Reduce the built environment's contribution to CO2 emissions? Facilitate investments in green technologies, equipment and infrastructure that reduce GHG emissions? Encourage and facilitate a shift to more sustainable modes of transport?
12. Climate change adaptation: To ensure Ealing adapts and becomes more resilient to the impacts of climate change and extreme weather events	Promote design which can withstand the impacts of future climate change events (such as overheating or flooding)? Reduce the impacts of climate change and extreme weather events on vulnerable groups, e.g., older generation?

The Local Plan has been assessed to determine whether or not it meets the objectives of the IIA framework using scoring criteria set out in Table 2, supported by narrative providing a concise justification for the evaluation.

The assessment is based on professional judgement, using the guiding questions set out in the framework, best practice and relevant evidence to anticipate the scale of change and its impact resulting from the policy intervention. In all cases, effects identified encompass those which are direct or indirect, permanent or temporary.

**Table 2: IIA scoring**

<b>+</b>	The policy supports the IIA Framework Objective
<b>0</b>	The policy neither supports nor conflicts with the IIA Framework Objective
<b>-</b>	The policy conflicts with the IIA Framework Objective
<b>N/A</b>	The policy is not relevant to the IIA Framework Objective
<b>?</b>	There is insufficient information to reliably assess

Where the assessment identifies a policy conflict, measures are identified that could be implemented to avoid or reduce this effect. In some cases, even where adverse effects have not been identified, recommendations have been made which may further enhance the policy.

## **2.3 IIA Options Assessment**

In this section, the three spatial policies are assessed. This is followed by the preferred option assessment in section 2.3.4.

### **2.3.1 Spatial Option 1: Strategic Corridor Focus**

#### **2.3.1.1 Description**

Spatial Option 1 focusses growth along the planned Elizabeth Line Corridor and A4020 Corridor that intersect with the borough's Opportunity Area and Metropolitan Centre. This Spatial Option therefore intends to reinforce the historic pattern of growth and development within Ealing. This involves maximising development and density in locations that have the highest existing concentration of services and economic activity and where strong existing or planned east-west connectivity takes place.

In addition, this Spatial Option looks to maintain the role of the wider town centre network by reinforcing these locations through low-moderate scale densities and development. The following key development principles underpin Spatial Option 1:

1. Focussed growth on strategic east-west corridors as defined by the London Plan.
2. Delivering Metropolitan scale growth at Southall Opportunity Area and Ealing Metropolitan Centre.
3. Building upon the existing hierarchy and structure of LB Ealing's town centre network.

#### **2.3.1.2 Assessment**

Table 3 sets out the IIA of Spatial Option 1.

Table 3: Spatial Option 1 Assessment

Objective	Score	Assessment	Mitigation/Recommendations
<b>Housing and communities</b>	+	<p>The delivery of residential development around Ealing Metropolitan Centre and Southall Opportunity Area would contribute to addressing housing need in the borough, including overcrowding. Although not directly addressed, in line with the London Plan a proportion of development would be expected to be affordable.</p> <p>A range of development densities and types of homes are proposed across the borough which would help support a diverse community at a borough level, although individual town areas are expected to be dominated by specific housing typologies which may not support diversity at a more local level.</p> <p>Consideration has been given to concentrating development around areas with good levels of existing services, economic activity and connectivity, and to supporting new residential development with provision of services and social infrastructure, which would contribute to building vibrant, mixed-use centres.</p>	Ensure where new development is not directly supported by services that there is good access, including via public transport and active travel modes, to other development centres providing services.
<b>Economy</b>	+	<p>Focusing development at Ealing and Southall would strengthen existing economic centres where significant employment opportunities are available.</p> <p>Lower scale development would be encouraged across other town centres, and Strategic Industrial Locations (SIL) and Locally Significant Industrial Locations (LSIL) would be protected for existing industrial uses, but also intensified in some areas to create space for new uses. This would therefore help to diversify economic opportunities across the borough and support a range of skill types, including for smaller and locally focussed businesses.</p> <p>Focussing growth along the Elizabeth Line Corridor would increase connectivity for residents in proximity to this corridor to employment opportunities in the wider region and may encourage investment into the borough. However, due to the focus of development along this corridor, there would not be a wide enough geographic spread of opportunities to address employment deprivation elsewhere in the borough, particularly around Northolt.</p>	North-south connectivity should be enhanced to ensure that residents in areas of the borough away from the east-west corridor are also able to benefit from the major employment opportunities that would be focused on Ealing and Southall.
<b>Education</b>	?	<p>Focusing development around historic areas of growth and ensuring new residential development is supported by new or existing services would likely support access to new and existing educational and/or skill opportunities. Additionally, development around strong transport routes, especially public transport, could increase access to educational and skills opportunities outside of the borough.</p>	This option has the potential to have a positive impact on education/skills, however further detail is required on any educational or training opportunities that could be delivered.

Objective	Score	Assessment	Mitigation/Recommendations
<b>Health</b>	<b>+</b>	<p>Focusing development around historic areas of growth and ensuring new residential development is supported by new or existing services would likely support access to new and existing health and social services and facilities. Southall in particular has the highest levels of health deprivation in the borough and therefore the provision of residential development, economic opportunity and supporting services would help improve key determinants of health.</p> <p>Limiting residential development along road corridors would help to avoid increasing the number of people exposed to poor air quality. Encouraging the use of public transport would also support better air quality outcomes.</p> <p>Supporting low-moderate scale development across the wider town centre network may encourage active travel if appropriate services and opportunities are available locally, encouraging physical activity and healthier lifestyles. Additionally, improving the public transport network can facilitate active travel when travelling to transport hubs.</p>	<p>Concentrating growth around the A4020 corridor would likely increase exposure to poor air quality. Mitigation measures should be implemented to limit negative impacts on the health of residents.</p>
<b>Connectivity</b>	<b>0</b>	<p>Focusing development along the Elizabeth Line/A4020 corridor would reinforce existing east-west connectivity, encouraging the use of the public transport network and creating demand for further transport development, such as the local bus network.</p> <p>Development within existing town centres may encourage active travel if appropriate services and opportunities are available locally. Active travel could also be supported by development around the Elizabeth Line and the opportunities for more local services, such as the bus network.</p> <p>However, prioritising east-west connectivity within the borough would not address existing poor public transport connectivity in the north. Additionally, the east-west road network forms a key part of this option which may limit a modal shift to more sustainable forms of transport.</p>	<p>The option notes the possibility of developing the bus network as part of support to local services across the lower order town centres. Pursuing this would help to mitigate the poor north-south connectivity in the borough that this option does not otherwise address. Other improvements to north-south connectivity, including active travel modes, should be considered.</p>

Objective	Score	Assessment	Mitigation/Recommendations
<b>Air quality and noise</b>	0	<p>Development within existing town centres may encourage active travel if appropriate services and opportunities are available locally. This could contribute towards improvements in air quality and noise levels within the borough.</p> <p>This option prioritises east-west connectivity within the borough and would not address poor public transport connectivity in the north of the borough. Four of LB Ealing's eight Air Quality Focus Areas (AQFAs) occur around roads in the north and therefore opportunities to improve air quality would be more limited in these areas. The remaining four AQFAs occur around roads along the Elizabeth Line/A4020 corridor. Focussing development in these areas may attract more cars, worsening air quality. However, improved public transport access and car-free development as required by the London Plan may be sufficient to offset or improve this.</p>	North-south connectivity via public and active travel modes should be enhanced to ensure that residents in areas of the borough away from the east-west corridor can benefit from air quality and noise improvements.
<b>Resources and land use</b>	+	<p>Prioritising development in Ealing Metropolitan Centre, Southall Opportunity Area, and along the east-west Elizabeth line/A4020 corridor would maximise efficient land use as most of LB Ealing's brownfield sites are located in these areas.</p> <p>Actively protecting, intensifying and diversifying SIL and LSIL would also safeguard the important economic contribution these play in the Ealing and London economy.</p>	
<b>Heritage and townscape</b>	-	<p>LB Ealing has a diverse range of townscapes within its seven towns. Prioritising significant levels of development is likely to include some tower buildings, in Ealing Metropolitan Centre and Southall Opportunity Area.</p> <p>There are limited heritage assets in Southall, which has already seen the development of tall buildings. This option is therefore likely to promote development in keeping with or building upon the current townscape in Southall.</p> <p>However, there is more likely to be negative effects on the townscape within the Ealing Metropolitan Centre, which is characterised by historic lower-scale development and a large number of heritage assets. Although some taller buildings are located along the A4020, high density development focusing on high-rise buildings may conflict with the wider townscape.</p>	To limit the impact on historic town centres, tall buildings should be focused around areas where they form part of the existing townscape.



Objective	Score	Assessment	Mitigation/Recommendations
<b>Biodiversity and green infrastructure</b>	<b>0</b>	<p>Protecting open and green spaces and prioritising development in Ealing Metropolitan Centre, Southall Opportunity Area, and along the east-west Elizabeth line/A4020 corridor would support safeguarding of Ealing's natural capital. Designated ecological sites within the borough are predominantly located in the north, away from the areas of significant development proposed.</p> <p>Whilst natural capital would be protected, the option does not include any aims around enhancement. However, Biodiversity Net Gain (BNG) requirements would ensure some enhancement in areas of development.</p> <p>There are currently poor levels of access to nature and open spaces within Ealing Metropolitan Centre and Southall Opportunity Area which would be exacerbated by further development.</p>	<p>Consider how natural capital could be enhanced beyond the fulfilment of BNG requirements. Consider how access to nature and open spaces can be improved in areas of high development.</p>
<b>Water resources</b>	<b>0</b>	<p>The borough as a whole is largely within fluvial Flood Zone 1, with the main areas at risk of flooding concentrated along the River Brent. Prioritising development in Ealing Metropolitan Centre, Southall Opportunity Area, and along the east-west Elizabeth line/A4020 corridor ensures development is predominantly within areas at low risk from fluvial flooding. The exception is a small area where the corridor crosses the River Brent at Hanwell, however, this is unlikely to increase overall vulnerability to flood risk. There are areas of surface water Flood Zone 3a throughout Ealing, including along major infrastructure corridors that pose an increased risk of flooding.</p> <p>There are already a number of Critical Drainage Areas within the borough, and it should be ensured that the significant levels of high density development proposed at Southall and Ealing do not exacerbate this risk.</p> <p>Prioritising development within east-west Elizabeth line/A4020 corridor would largely avoid potential impacts to water quality within the borough's rivers, which are mostly located away from the corridor.</p>	<p>New developments should aim to improve drainage of surface water where they intersect with Critical Drainage Areas.</p> <p>Mitigation measures should be implemented to reduce the risk of surface water flooding during both construction and operational phases of any developments.</p>

Objective	Score	Assessment	Mitigation/Recommendations
<b>Climate change mitigation</b>	0	<p>Supporting development within existing town centres may encourage active travel modes and less car usage if appropriate services and opportunities are available locally. This option also promotes the use of public transport modes, particularly along the east-west corridor. Increased use of active and public transport modes would contribute to a reduction in emissions.</p> <p>The option proposes significant residential development. New homes typically have lower energy demands which would help to align with LB Ealing's 'zero-carbon borough' ambition, as set out in the Climate and Ecological Strategy. However, there are substantial emissions associated with all new construction and in some cases reusing and retrofitting existing buildings may be the more sustainable option.</p> <p>Tall buildings, which may be developed in order to meet the housing targets, typically have a larger carbon footprint than other housing typologies which would not support the objective of reducing carbon emissions.</p>	<p>North-south connectivity via public and active travel modes should be enhanced. Where SIL and LSIL is made available for new uses, consideration should be given to encouraging the development of green industry uses.</p> <p>Consideration should be given when deciding on housing typology and density in order to meet the housing needs of Ealing but not compromising on the objective to reduce carbon emissions.</p>
<b>Climate change adaptation</b>	0	<p>The borough as a whole is largely within Flood Zone 1, with the main areas at risk of flooding concentrated along the River Brent. Prioritising development in Ealing Metropolitan Centre, Southall Opportunity Area, and along the east-west Elizabeth line/A4020 corridor ensures development is predominantly within areas at low risk from fluvial flooding, and therefore is unlikely to increase overall vulnerability to flood risk.</p> <p>However, there are areas of surface water Flood Zone 3a throughout Ealing, including along major infrastructure corridors that pose an increased risk of flooding.</p> <p>There are already a number of Critical Drainage Areas within the borough, and it should be ensured that the significant levels of high density development proposed at Southall and Ealing do not exacerbate this risk.</p>	<p>New developments should aim to improve drainage of surface water where they intersect with Critical Drainage Areas. As well as mitigate the risk of surface water flooding during the construction and operation of developments.</p>

## 2.3.2 Spatial Option 2: Network Connectivity Focus

### 2.3.2.1 Description

Spatial Option 2 looks to prioritise north-south connectivity, without compromising east-west connectivity. This provides a bespoke Ealing response to the London Plan that incorporates strategic priorities of east-west connectivity to the Central Activity Zone and Heathrow Airport whilst addressing the local sustainable connectivity issues within Ealing.

The following key development principles underpin Spatial Option 2:

1. Incorporate the spatial vision of the London Plan, while creating a bespoke LB Ealing focussed response.
2. Reinforce east-west connectivity prioritised in the London Plan (via the Elizabeth Line, A40, Uxbridge Road).
3. Re-orientate the borough with a focus on improving north-south connectivity (via West London Orbital, Greenford Line Improvements and wider road network to promote active travel modes).

### 2.3.2.2 Assessment

Table 4 sets out the IIA of Spatial Option 2.

Table 4: Spatial Option 2 Assessment

Objective	Score	Assessment	Mitigation/Recommendations
<b>Housing and communities</b>	+	<p>The delivery of residential development around Ealing Metropolitan Centre and Southall Opportunity Area would contribute to addressing housing need in the borough, including overcrowding. Significant levels of residential development are also proposed across the other borough town centres. Although not directly addressed, in line with the London Plan a proportion of development would be expected to be affordable.</p> <p>A limited range of development densities are proposed across the borough, with most sites developed to a medium density. The lack of range supported by this option may limit appropriate housing availability for diverse groups of residents. However, the dispersed pattern of growth across the towns in Ealing, in comparison to Options 1, may offer the opportunity to develop a greater range of housing typologies.</p> <p>The spread and density of development proposed by this option may not be able to support good levels of services at all residential sites.</p>	Ensure where new development is not directly supported by services that there is good access, including via public transport and active travel modes, to other development centres providing services.
<b>Economy</b>	+	<p>Focusing development in Ealing and Southall would help to develop economic centres where significant employment opportunities are available.</p> <p>Moderate development is proposed across the other town centres, which would help to balance employment and economic opportunities across the borough, addressing pockets of employment deprivation.</p> <p>This option would protect SIL and LSIS but would look to maximise unproductive industrial land near town centres for non-industrial in-demand skills and businesses. This would create additional employment and economic opportunities but may have a negative impact on industrial businesses and employment.</p> <p>Focussing growth along the Elizabeth Line Corridor in conjunction with north-south connectivity would increase connectivity for all residents to employment opportunities in the wider region and may encourage investment into the borough.</p>	This option has the potential to have a positive impact on education/skills, however further detail is required on any educational or training opportunities that could be delivered.
<b>Education</b>	?	<p>Consideration is given to ensuring that residential development is supported by new or existing services, which would likely include educational and/or skills opportunities. However, the spread and density of development proposed by this option may not be able to support strong services at all residential sites.</p> <p>Development around strong transport routes, especially public transport, could increase access to educational and skills opportunities across and outside of the borough.</p>	This option has the potential to have a positive impact on education/skills, however further detail is required on any educational or training opportunities that could be delivered.

Objective	Score	Assessment	Mitigation/Recommendations
<b>Health</b>	+	<p>The delivery of residential development which is supported by new or existing services would likely include health and social services and facilities. Southall in particular has the highest levels of health deprivation in the borough, and therefore the provision of residential development, economic opportunity and supporting services would help improve key determinants of health. However, the spread a of development proposed may not be able to support strong service offerings at all residential sites.</p> <p>Limiting residential development along road corridors would alleviate increasing exposure to poor air quality. Encouraging the use of public transport network would also support better air quality outcomes.</p> <p>Supporting moderate scale development across the wider town centre network may encourage active travel if appropriate services and opportunities are available locally, encouraging physical activity and healthier lifestyles. Additionally, improving the public transport network can facilitate active travel.</p>	
<b>Connectivity</b>	+	<p>This option supports the development of north-south connectivity corridors with a focus on improving public and active travel modes, in addition to focused growth along the east-west Elizabeth line/A4020 corridor. This would help to address poor public transport connectivity in the north of the borough.</p> <p>Supporting moderate scale development across the wider town centre network may encourage active travel if appropriate services and opportunities are available locally. Active travel could also be supported by development around the Elizabeth Line and the opportunities for more local services, such as the bus network.</p> <p>However, much of the connectivity improvement opportunities relies on longer term delivery or improvement of infrastructure through the West London Orbital and Greenford Line Improvement, so would not provide immediate solutions.</p>	Improvements to the bus and active travel networks should be delivered within a timescale that mitigates the gap in north-south connectivity until rail infrastructure projects are delivered
<b>Air quality and noise</b>	+	<p>Development within existing town centres may encourage active travel if appropriate services and opportunities are available locally. This would lead to an improvement in air quality and noise levels within the borough.</p> <p>This option focusses on improving north-south connectivity with a focus on public and active travel. Four of LB Ealing's eight AQFAs are in the north of the borough and this focus would help to support improvements in air quality in these areas.</p> <p>This option would limit residential development along road corridors, which would limit increases in residents exposed to poor air quality.</p>	Developing within existing town centres may increase exposure to poor air quality as these are typically hotspots for poor air quality. Mitigation measures should be implemented to limit negative impacts on the health of residents and town centre users.



Objective	Score	Assessment	Mitigation/Recommendations
<b>Resources and land use</b>	0	<p>Prioritising development in Ealing Metropolitan Centre, Southall Opportunity Area, and along the east-west Elizabeth line / A4020 corridor would maximise efficient land use as most of LB Ealing's brownfield sites are located in these areas. The option aims to maximise the usage of SIL and LSIL which would also increase efficient land use.</p> <p>However moderate development is also proposed across the other town centres within the borough, which may not drive efficient use of land as limited brownfield land is located in these areas.</p>	Ensure usage of brownfield land is maximised across all of LB Ealing, before other options are pursued.
<b>Heritage and townscape</b>	0	<p>The borough has a diverse range of townscapes within its seven towns. Heritage assets in the borough are largely focussed around Ealing. This option focuses development around Ealing Metropolitan Centre and Southall Opportunity Area, however moderate development is also proposed across the other town centres within the borough. The majority of sites would likely be developed to medium density with a range of medium and some low rise buildings. This option is likely to promote development in keeping with the current townscapes across the borough, although would be likely to increase residential density in some of the smaller towns.</p>	The moderate development proposed across the lower order towns should be located in areas where densification would not detract from historic character.
<b>Biodiversity and green infrastructure</b>	0	<p>Protecting open and green spaces and prioritising development in Ealing Metropolitan Centre and Southall Opportunity Area would support safeguarding of Ealing's natural capital. Designated ecological sites within the borough are located in the north, where although moderate development is proposed it is unlikely to be at a scale that impacts these sites.</p> <p>Whilst natural capital would be protected, the option does not include any aims around enhancement. However, Biodiversity Net Gain (BNG) requirements would ensure some enhancement in areas of development.</p> <p>The north of the borough is characterised by more green spaces and development in this area would support access to nature and open spaces, although increased access to nature may have a negative impact on biodiversity where the scale and type of access is not appropriate. There are currently poor levels of access to nature and open spaces within Ealing Metropolitan Centre and Southall Opportunity Area and supporting further development in these areas would exacerbate this issue.</p>	Consider how natural capital could be enhanced beyond the fulfilment of BNG requirements, and also protected in the context of increasing access to nature for residents. Consider how access to nature and open spaces can be improved in areas of high development

Objective	Score	Assessment	Mitigation/Recommendations
<b>Water resources</b>	0	<p>The borough as a whole is largely within Flood Zone 1, with the main areas at risk of flooding concentrated along the River Brent. Development is prioritised in Ealing Metropolitan Centre and Southall Opportunity Area, with moderate development proposed across the other town centres within the borough and along north-south connectivity route. This approach ensures development is predominantly within areas at low risk from flooding, although some sites proposed for moderate development do fall close to areas of increased flood risk along the River Brent.</p> <p>There are already a number of Critical Drainage Areas within the borough, and it should be ensured that the development proposed across the borough does not exacerbate this risk.</p> <p>Some moderate development is proposed along the River Brent corridor which risks potential impacts to water quality within the borough's rivers from increased pollution associated with the construction and operation of new development.</p>	<p>New developments should aim to improve drainage of surface water where they intersect with Critical Drainage Areas. Assessment of water quality impacts from development along the River Brent corridor would be required to avoid adverse effects and understand if development in this area is appropriate.</p>
<b>Climate change mitigation</b>	0	<p>Supporting development within existing town centres may encourage active travel modes and less car usage if appropriate services and opportunities are available locally.</p> <p>This option also supports improvement of public and active travel modes along existing north-south corridors and development within these areas which would contribute to a reduction in emissions.</p> <p>The option proposes significant residential development. New homes have a lower energy demand which would help to align with LB Ealing's 'zero-carbon borough' ambition. However, there are substantial emissions associated with all new construction.</p>	<p>Where SIL and LSIL is made available for new uses, consideration should be given to encouraging the development of green industry uses.</p>
<b>Climate change adaptation</b>	0	<p>The borough as a whole is largely within Flood Zone 1, with the main areas at risk of flooding concentrated along the River Brent. Development is prioritised in Ealing Metropolitan Centre and Southall Opportunity Area, with moderate development proposed across the other town centres within the borough and along north-south connectivity route. This approach ensures development is predominantly within areas at low risk from flooding, although some sites proposed for moderate development do fall close to areas of increased flood risk along the River Brent, which may increase overall vulnerability to flood risk.</p> <p>There are already a number of Critical Drainage Areas within the borough, and it should be ensured that the development proposed across the borough does not exacerbate this risk.</p>	<p>New developments should aim to improve drainage of surface water where they intersect with Critical Drainage Areas. Proposed development within or near to areas existing flood risk areas should fully assess and mitigate any potential impacts.</p>

### **2.3.3 Spatial Option 3: Neighbourhood Centre Focus**

#### **2.3.3.1 Description**

Spatial Option 3 focuses on delivering growth within LB Ealing's neighbourhood centres to provide a more equal provision of infrastructure and opportunity (i.e., connectivity, economic opportunity, social infrastructure) across the borough. This option promotes a polycentric approach to urban development that will look to deliver growth from Metropolitan Centres to Neighbourhood Centres.

The Spatial Option will seek to deliver more opportunities close to where people live through a balanced approach to development. This Spatial Option will also continue to support the strategic priorities of the London Plan, in particular east-west connectivity. The following key development principles underpin Spatial Option 3:

1. Focus growth within LB Ealing's vibrant centres to provide an equality of provision across the borough.
2. Use new development to distribute opportunity and services close to where people live.
3. Reinforce interdependences so that centres are greater than the sum of their part.
4. Development more evenly spread across the borough.

#### **2.3.3.2 Assessment**

Table 5 sets out the IIA of Spatial Option 3.

Table 5: Spatial Option 3 Assessment

Objective	Score	Assessment	Mitigation/Recommendations
<b>Housing and communities</b>	+	<p>Concentrating development within existing neighbourhood centres would reinforce the interdependencies of neighbourhoods across LB Ealing delivering of more opportunities close to where people live. The delivery of residential development around Ealing Metropolitan Centre and Southall Opportunity Area would contribute to addressing borough-wide housing need, including overcrowding. Although not directly addressed, in line with the London Plan, a proportion of development would be expected to be affordable.</p> <p>A range of development densities and types of homes are proposed across the borough which would help support a diverse community at a borough level, although individual town areas are expected to be dominated by specific housing typologies which may not support diversity at a more local level.</p> <p>The dispersed pattern of development proposed may not support a good level of services at all residential sites.</p>	Ensure where new development is not directly supported by services that there is good access, including via public transport and active travel modes, to other development centres providing services.
<b>Economy</b>	+	<p>Growth at Ealing and Southall would help to develop economic centres where significant opportunities are available. The provision of development within neighbourhood centres would also create accessible economic opportunities which support local residents.</p> <p>Strategic Industrial Locations (SIL) and Locally Significant Industrial Location (LSIL) would be protected for existing industrial uses but also intensified in some areas to create space for new uses. This option would help to diversify economic opportunities across the borough and support a range of skill types, including for smaller and locally focussed businesses.</p> <p>By focussing growth across LB Ealing, there would be a greater geographic spread of opportunities to address employment and deprivation issues.</p>	

Objective	Score	Assessment	Mitigation/Recommendations
<b>Education</b>	?	<p>Proposals for development across neighbourhoods within the wider catchment, not just in Ealing and Southall town centres, should be supported by new or existing services including educational and/or skill opportunities.</p> <p>Additionally, development around strong transport routes, especially public transport, could increase access to educational and skills opportunities outside of the borough.</p>	Further detail is required to understand the education impacts of this spatial option.
<b>Health</b>	+	<p>The delivery of residential development which is supported by new or existing services would likely include access to health and social services and facilities. Southall and Ealing in particular have the highest levels of health deprivation in the borough and therefore the provision of residential development, economic opportunity and supporting services would help improve key determinants of health.</p> <p>However, the neighbourhood centre focus would help target health interventions in most areas across LB Ealing, such as Acton which has poor air quality and overcrowding.</p> <p>Supporting development across the borough may encourage active travel if appropriate services and opportunities are available locally, encouraging physical activity and healthier lifestyles.</p>	
<b>Connectivity</b>	?	<p>This delivery of the Elizabeth Line would enable the neighbourhood centre approach to encourage active travel if appropriate services and opportunities are available locally.</p> <p>Increased infrastructure around neighbourhood centres, not just metropolitan centres would encourage more sustainable forms of transport.</p>	<p>The option notes the use of the Elizabeth Line to support local services across the lower order town centres. This does not help address the issue of poor north-south connectivity in the borough. Further detail is required to understand the improvements to north-south connectivity.</p>



Objective	Score	Assessment	Mitigation/Recommendations
<b>Air quality and noise</b>	+	<p>Development within existing town centres may encourage active travel if appropriate services and opportunities are available locally. This would lead to an improvement in air quality and noise levels within the borough.</p> <p>This option recognises east-west connectivity within the borough, through its reliance on the Elizabeth Line but does not explicitly address poor public transport connectivity in the north of the borough. Four of LB Ealing's eight Air Quality Focus Areas (AQFAs) are in the north of the borough and therefore improvements in air quality be more limited in these areas.</p> <p>However, a neighbourhood centre approach would allow for targeted interventions to reduce poor air quality in areas such as Acton, rather than just focussing on Southall and Ealing.</p>	North-south connectivity via public and active travel modes should be enhanced to ensure that residents in areas of the borough away from the east-west corridor can benefit from air quality and noise improvements.
<b>Resources and land use</b>	+	<p>Development in Southall would maximise efficient land use as many of LB Ealing's brownfield sites are located in this area. The redevelopment of land between Greenford and Perivale would unlock economic opportunities in the north of the borough.</p> <p>Actively protecting, intensifying and diversifying SIL and LSIL would also safeguard the important economic contribution these play in the LB Ealing and London economy.</p>	
<b>Heritage and townscape</b>	0	<p>LB Ealing has a diverse range of townscapes within its seven towns. Focussing significant levels of development across focal points on the borough is likely to include medium rise building typologies with some limited higher elements.</p> <p>A number of sites would support lower levels of developments with low rise buildings which would be sympathetic to the local character.</p> <p>There are limited heritage assets to the north and west of the borough. Therefore, development in these areas is less likely to have negative effect on the existing townscape.</p>	To limit the impact on historic town centre, tall building should be focussed around areas where they form part of the existing townscape.
<b>Biodiversity and green infrastructure</b>	0	<p>The north of the borough is characterised by more green spaces and delivery of new development away from metropolitan centres could put pressure on existing ecological sites, habitats and species. However, this option proposes moderate development which is unlikely to be at a scale that impacts these sites and would support access to nature and open spaces for new residents.</p> <p>No aims or commitments are included in relation to enhancement, however Biodiversity Net Gain (BNG) requirements would ensure some enhancement in areas of development.</p>	<p>Consider how natural capital could be enhanced beyond the fulfilment of BNG requirements. Consider how access to nature and open spaces can be improved in areas of high development.</p> <p>Consider identifying areas, off-site from the developments, that could be used to increase biodiversity net gain across the borough.</p>

Objective	Score	Assessment	Mitigation/Recommendations
<b>Water resources</b>	0	<p>The borough as a whole is largely within Flood Zone 1, with the main areas at risk of flooding concentrated along the River Brent. Development in the north of the borough near south Greenford could potentially affect or be impacted by flooding.</p> <p>There are also areas of surface water Flood Zone 3a throughout Ealing, therefore it will be difficult to avoid developing in or near to areas that have an increased risk of flooding. However, this would avoid areas of flood risk and protect green and open spaces which would provide natural forms of flood risk mitigation.</p> <p>There are already a number of Critical Drainage Areas (CDAs) within the borough, and it should be ensured that the significant levels of high density development proposed at Southall and Ealing do not exacerbate this risk. Focusing development on other neighbourhood areas would help alleviate pressure on already stressed CDAs.</p>	<p>New developments should aim to improve drainage of surface water where they intersect with Critical Drainage Areas. Proposed development within or near to areas existing flood risk areas should fully assess and mitigate any potential impacts.</p> <p>Mitigation measure should be implemented to reduce the risk of surface water flooding during both the construction and operational phases of any development.</p>
<b>Climate change mitigation</b>	+	<p>Supporting development within existing town centres may encourage active travel modes and less car usage if appropriate services and opportunities are available locally. Increased use of active and public transport modes would contribute to a reduction in emissions and improve the overall air quality.</p> <p>The dispersed approach to development would allow residents to live closer to economic opportunities, retail and leisure which may reduce travel and contribute to a reduction in emissions.</p> <p>This proposes residential development across the borough. New homes have a lower energy demand which would help align with LB Ealing's 'zero-carbon borough' ambition. However, there are substantial emissions associated with all new construction.</p>	<p>North-south connectivity via public and active travel modes should be enhanced. Where SIL and LSIL is made available for new uses, consideration should be given to encouraging the development of green industrial uses.</p>
<b>Climate change adaptation</b>	0	<p>The borough as a whole is largely within Flood Zone 1, with the main areas at risk of flooding concentrated along the River Brent. This would avoid areas of flood risk and protect green and open spaces which would provide natural forms of flood risk mitigation.</p> <p>There are already a number of Critical Drainage Areas within the borough, and it should be ensured that the significant levels development proposed at Southall and Ealing and moderate levels of development dispersed across the borough do not exacerbate this risk.</p> <p>This would protect environmentally sensitive land and open spaces which provide natural capital in the form of carbon storage and sequestration.</p>	<p>New developments should aim to improve drainage of surface water where they intersect with Critical Drainage Areas. Proposed development within or near to areas existing flood risk areas should fully assess and mitigate any potential impacts.</p>

## 2.3.4 Preferred Option

### 2.3.4.1 Description

The IIA assessment considered the potential environmental, social and economic effects of each Spatial Option and made recommendations which directly contributed to the development of the Preferred Option. This analysis recognised that each town in LB Ealing will play a different role in accommodating the growth and development of the borough and resulted in merging components of all three spatial options to form an option which builds upon the wider London Plan Spatial Framework and is underpinned by the following principles:

- Delivering Growth Along Transport Corridors.
- Focussing on Neighbourhood Centres.
- Promoting Sustainable Connectivity.

### 2.3.4.2 Assessment

Table 6: Preferred Option Assessment sets out the IIA of the Preferred Option.

**Table 6: Preferred Option Assessment**

Objective	Score	Assessment	Mitigation/Recommendations
<b>Housing and communities</b>	+	<p>The housing-led growth of neighbourhood centres, particularly around Greenford and Northolt, will provide an equality of provision across the borough rather than just continuing to develop the centres of Ealing town and Southall.</p> <p>This would support the provision of a range of services, opportunities and cultural industries which will support the development of diverse and sustainable communities.</p> <p>The protection of open spaces would provide attractive areas for recreation, exercise and relaxation, enhancing community amenity.</p>	It could be beneficial to also consider specialist housing or people of all ages and those with long-term disabilities or accessibility requirements.
<b>Economy</b>	+	<p>The balanced approach to growth across the borough will support a diversified economy and resilience of town centres enabling more residents to access economic opportunities and address deprivation issues.</p> <p>The provision of mixed-use centres could generate revenue and deliver a range of employment types for local residents.</p> <p>Reinforcing LB Ealing's relationship with the Central Activities Zone (CAZ) and Heathrow Airport will reinforce LB Ealing's functional link with the rest of London unlocking further employment opportunities.</p>	The Preferred Option could make reference to supporting small, local and/or green businesses and social enterprises.
<b>Education</b>	+	<p>The Preferred Option would provide school places for early years and secondary pupils in Southall.</p> <p>Development around strong transport routes, especially public transport, could increase access to educational and skills opportunities across and outside of the borough.</p>	<p>Further detail is required to understand the education impacts of this spatial option.</p> <p>It could be beneficial to make reference to supporting industries and employers which provide training and education opportunities, such as workshops, spaces for skills and collaboration with local colleagues and schools.</p>

Objective	Score	Assessment	Mitigation/Recommendations
<b>Health</b>	+	<p>The Preferred Option would support several health determinants associated with the built environment and socio-economic factors, such as increased employment opportunities, access to recreational and social activities and open space. The option also directly supports active travel within town centres, encouraging healthier lifestyles.</p> <p>Accessibility to healthcare facilities in Ealing and Southall will be improved along with the air quality in Ealing Metropolitan Centre helping to address key health determinants in these towns</p>	
<b>Connectivity</b>	+	<p>The Preferred Option strongly supports this objective by reinforcing north-south connectivity, delivered through the West London Orbital rail infrastructure scheme and reinforcing the central corridor between the CAZ and Heathrow Airport improving east-west connectivity within the borough and connectivity to key economic centres outside of LB Ealing.</p> <p>The option also supports measures to allow most people to access what they need within twenty minutes from their homes in an active way, which would result in direct positive improvements in connectivity across the borough.</p>	It could be beneficial include reference to measures that allow active travel to be safe and affordable.
<b>Air quality and noise</b>	+	<p>This Preferred Option encourages public and active travel routes which would reduce private vehicle use and have a beneficial impact on local emissions.</p> <p>Air quality is a key health determinant within Ealing Metropolitan Centre and the option identifies the need to address this.</p>	It could be beneficial to promote new buildings and businesses in town centres which adopt energy efficient measures and construction techniques which minimise emissions.
<b>Resources and land use</b>	+	<p>The Preferred Option strongly supports the protection and intensification of industrial land, which would positively contribute to both the local and London economy. It also notes the potential for mixed-intensification, further supporting the efficient use of land in Ealing.</p> <p>Supporting measures that allow most people to access what they need within twenty minutes from their homes would likely promote efficient land use practices across the borough and the provision of mixed-use developments to achieve this.</p>	The Preferred Option could make reference to measures which ensure the remediation of any contaminated land prior to development.

Objective	Score	Assessment	Mitigation/Recommendations
<b>Heritage and townscape</b>	+	<p>The Preferred Option would facilitate the protection of open spaces and their views, preserving the existing townscapes of Ealing. Open spaces within the urban environment typically provide more natural, attractive areas, helping to enhance the local townscape and create a more desirable area for residents, businesses and visitors.</p> <p>Growth across the borough would rejuvenate the town centres through the provision of mixed commercial and leisure facilities. It is anticipated that the significance of historic environment would be protected via relevant planning requirements and design standards.</p>	The policy could include measures to encourage sensitive design that limits visual intrusion of industrial sites according to local character.
<b>Biodiversity and green infrastructure</b>	+	<p>The Preferred Option would protect and enhance open spaces and green infrastructure across LB Ealing, benefiting local biodiversity and facilitating opportunities for people to access nature.</p>	The option could go further and prohibit all development within open and green spaces and enhance existing open space particularly that which is currently of low ecological value.
<b>Water resources</b>	+	<p>The Preferred Option will encourage development to avoid areas at risk of flooding and the development of industrial land may offer the chance to enhance groundwater quality on brownfield sites through remediation of contamination sources.</p> <p>It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage</p>	It could be beneficial to include measures that encourage the use of flood resilient design measures for new developments, including SUDS. This would be particularly relevant to town centres in the river corridor areas of the borough.
<b>Climate change mitigation</b>	+	<p>The Preferred Option would facilitate forms of active travel, such as walking and cycling, which would reduce reliance on private vehicle usage and encourage more sustainable modes of transport supporting the reduction of CO<sub>2</sub> emissions.</p> <p>Development of industrial sites is likely to result in carbon emissions. However, industrial development may facilitate investments in green technologies, equipment and infrastructure that reduce GHG emissions.</p>	The policy could include measures to encourage connectivity with sustainable forms of transport and the use of sustainable construction materials, as part of good design and mitigating climate change impacts.

Objective	Score	Assessment	Mitigation/Recommendations
<b>Climate change adaptation</b>	+	<p>The Preferred Option would directly improve the borough's resilience to climate change through the provision of mixed centres by offering resilience through shared public infrastructure.</p> <p>The Preferred Option supports the avoidance of development at risk of flooding but does not actively promote flood resilient design. Supporting the protection of public open space and nature sites, could help avoid exacerbating flood risk, and to provide cooler areas of shade and alleviate urban heat island effects.</p>	It could be beneficial to include measures to encourage resilience as part of good design and promote sustainable design practices.



## 2.4 IIA Policy Assessment

In this section the overarching Strategic policies are assessed, followed by the Town policies in section 2.4.2 and the Development Management policies in Section 2.4.3.

### 2.4.1 Strategic policies IIA

For Strategic Policy text, refer to Chapter 3 of the Local Plan.

#### 2.4.1.1 A Vision for Ealing

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy would provide equitable access to jobs that provide decent living incomes that can support genuinely affordable homes for all.	The policy could detail whether 'equitable access' relates to physical access or equalities.
<b>Economy</b>	+	The policy aims to make Ealing the engine of west London's new economy, provide equitable access to jobs with living incomes, and grow and diversify Ealing's business space. Doing so would have a positive effect on Ealing's economy.	
<b>Education and skills</b>	0	The policy would not directly affect educational provision in the borough. However, promoting 20 minute neighbourhoods across the borough could help contribute towards minimising education inequalities through improved connectivity to schools and education facilities.	It could be beneficial for the newly accessible jobs to include training schemes and/or upskilling opportunities.
<b>Health</b>	+	Promoting 20 minute neighbourhoods across the borough would encourage residents to walk and cycle, which would positively affect health.	It could be beneficial to include wording on making walkways and cycle routes both safe and accessible for all.
<b>Connectivity</b>	+	The policy would promote active travel through the delivery of 20 minute neighbourhoods, enhancing connectivity through sustainable means across Ealing.	It could be beneficial to include wording on making walkways and cycle routes both safe and accessible for all.
<b>Air quality and noise</b>	+	Promoting 20 minute neighbourhoods across the borough would encourage residents to walk and cycle, which would reduce reliance on private vehicles, and therefore positively affect air quality and noise.	

Objective	Score	Assessment	Mitigation / Recommendations
<b>Resources and land use</b>	+	The policy supports the strengthening of Ealing's industrial spaces, which would positively contribute to both the local and London economy.	
<b>Historic environment, culture and townscape</b>	0	The policy would enhance the unique characteristics and cultural identities of each of Ealing's seven towns.	
<b>Biodiversity and Green Infrastructure</b>	+	The policy mentions becoming a 'greener and more sustainable borough' which would likely benefit local biodiversity.	The policy could include details of what 'greener' means in terms of biodiversity and/or green infrastructure.
<b>Water environment</b>	N/A	The policy is not considered relevant to this objective.	
<b>Climate change mitigation</b>	+	Promoting 20 minute neighbourhoods across the borough would encourage residents to walk and cycle, which would reduce reliance on private vehicles, and therefore greenhouse gas emissions.	
<b>Climate change adaptation</b>	0	The policy mentions becoming a more sustainable borough and taking action on climate change.	The policy could include wording to detail what action will be taken i.e., resilient design practices.

### 2.4.1.2 Tackling the climate crisis

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy would support the delivery of good quality housing by setting measurable sustainability standards for new developments, such as BREEAM or Passivhaus. The policy promotes thriving communities.	
<b>Economy</b>	+	Policy SP2.1 specifically aims to support an inclusive economy which spreads growth across the borough more equally. Additionally, investment in public transport and active travel infrastructure would provide the opportunity to create new strategic north-south routes that will either reinforce or establish interdependencies between employment sites.	
<b>Education and skills</b>	N/A	The policy is not considered relevant to this objective.	
<b>Health</b>	+	The policy would direct development toward sustainable locations through the creation of 20-minute neighbourhoods. This would encourage walking and cycling, which would improve the mental and physical health of Ealing's residents. The policy would also promote community food growing, orchards, protect allotments and support food partnerships. This would improve opportunities for healthy eating. Policy SP2.3 specifically seeks to safeguard and improve existing social infrastructure, and deliver new infrastructure, which is likely to include a number of health, social and community needs. This would provide a wide range of community and social support and encourage social cohesion and connectivity.	The policy could make reference to supporting walking and cycling routes which are safe and accessible to all.
<b>Connectivity</b>	+	The policy would direct development toward sustainable locations through the creation of 20-minute neighbourhoods. This would encourage walking and cycling, which would improve the mental and physical health of Ealing's residents.	The policy could make reference to supporting walking and cycling routes which are safe and accessible to all.
<b>Air quality and noise</b>	+	The policy would support the reduction in vehicle usage and number of journeys made in Ealing, and associated noise and air emissions. The policy would enhance the usage of low and zero carbon energy sources and technologies, such as heat pumps and solar heating. The policy would also help to improve air quality by ensuring new developments do not deteriorate existing air quality, avoid exposure to unacceptable levels of poor air quality, and contribute towards direct air quality improvements where possible. The	The policy refers to monitoring and reporting on environmental targets for aviation. The policy could be strengthened by also adding measures to remediate / mitigate where necessary.

Objective	Score	Assessment	Mitigation / Recommendations
		policy would also mitigate the environmental impacts of the aviation industry, which are large contributors towards noise and air emissions.	Adaptation of buildings to conserve energy could also seek to enhance building conditions for users e.g. good sound insulation for residential users.
<b>Resources and land use</b>	+	The policy would encourage the efficient use of land by supporting the 20-minute neighbourhood concept to ensure needs can be met through sustainable forms of transport. The policy also supports meanwhile uses for multi-phase vacant land, maximising the opportunities on available land. Additionally, the policy would promote sustainable design and construction techniques, including the re-use of existing buildings and their materials and creating resilient and adaptable homes. The policy would also support that the life span of buildings and their materials is for as long as possible. Lastly, the policy actively supports reducing waste and encouraging self-sufficiency.	
<b>Historic environment, culture and townscape</b>	+	The policy would support a character and heritage-led approach to mitigate the causes and effects of climate change in areas of high character, or of heritage value.	
<b>Biodiversity and Green Infrastructure</b>	+	The policy would improve opportunities for urban greening and a net gain in biodiversity increasing the potential for carbon sequestration and improving resilience of the green infrastructure network.. The policy would also enhance and expand the network of green infrastructure. The policy would support tree planting, woodlands, orchards, hedgerows, and rewilding to promote greater biodiversity.	
<b>Water environment</b>	+	The policy would promote sustainable design and construction techniques, including those that reduce water consumption. The policy would also prevent an increase of flood risk through appropriate development and the promotion of SuDS.	
<b>Climate change mitigation</b>	+	The policy is centred around mitigating climate change, with an overarching goal of a net carbon neutral Ealing by 2030. This would be achieved by investing in sustainable connectivity across the borough. The policy includes a number of measures to achieve this, including electric vehicle charging points, sustainable design standards and the use of low and zero carbon energy sources.	

Objective	Score	Assessment	Mitigation / Recommendations
Climate change adaptation	+	The policy would result in the delivery of targeted infrastructure and public realm improvements which would build resilience to future climate related events. Measures include the promotion of resilient and adaptable infrastructure and the use of SUDs and other measures to alleviate flood risk.	

### 2.4.1.3 Fighting inequality

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	Policy SP 3.3.B would contribute positively to the delivery of mixed-use centres that are based on 20 minute neighbourhood principles which would encourage access to community services as well as enhancing existing community facilities. In addition, the introduction of Health Impact Assessments for major developments could assist with the delivery of healthy places to live and work.	
<b>Economy</b>	+	Policy SP 3.1.B would maximise opportunities for employment across the borough. The delivery of 20 minute neighbourhoods would provide employment opportunities closer to home, which supports resilient and flexible economic centres and Policy SP 3.3 D would also help reduce commuting time by better integrating land uses.	
<b>Education and skills</b>	+	The policy supports educational opportunities through the identification of educational need for new establishments within and around developments.	
<b>Health</b>	+	The policy is oriented towards the delivery healthy places to live and work in Ealing. The policy would achieve this through the delivery of easily accessible neighbourhoods, necessary social and community infrastructure as well as implementation of Health Impact Assessment for new strategic developments. It also supports wider determinants of health, such as encouraging active travel, increasing access to healthy food, improving access to green and open spaces and recreational activity and improving housing.	
<b>Connectivity</b>	+	The policy would promote active travel through the delivery of 20 minute neighbourhoods, enhancing connectivity through sustainable means across Ealing.	The policy could make reference to delivering safe and accessible walking and cycling routes. The policy could also make reference to supporting existing and new infrastructure which is in close proximity to public transport options.
<b>Air quality and noise</b>	+	Policy SP 3.3 would contribute positively to air quality within Ealing through the delivery of 20 minute neighbourhoods which would reduce reliance on private vehicles and support the use of more sustainable forms of transport. This would also help to improve the respiratory health of local communities.	The policy could make reference to particular interventions in relation to how air quality would be improved.

Objective	Score	Assessment	Mitigation / Recommendations
<b>Resources and land use</b>	+	Policy SP 3.3 specifically supports the efficient use of land and resources through the reintegration of land uses and improving the supply of outdoor recreational facilities which could lead to improved physical and mental health.	
<b>Historic environment, culture and townscape</b>	+	Policy SP 3.3.C would support this objective by encouraging development which recognises the importance of local character.	
<b>Biodiversity and Green Infrastructure</b>	+	SP 3.3.E would contribute to the maintenance of existing and new green and open spaces and improvement of access to such infrastructure.	The policy could also include reference to supporting open green spaces which are safe and accessible.
<b>Water environment</b>	N/A	This policy is unlikely to contribute to flood risk and water environment objectives in the borough.	
<b>Climate change mitigation</b>	+	Policy SP 3.3.F would contribute to mitigating climate change through improving existing housing stock and alleviate urban heat island effects.	
<b>Climate change adaptation</b>	+	The policy would result in the delivery of targeted green infrastructure and public realm improvements which would build resilience to future climate related events.	



#### 2.4.1.4 Creating good jobs and growth

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	<p>Maintaining and managing industrial land would limit land available for other uses, including housing. However, Policy SP 4.3 commits to meeting and where appropriate exceeding the 10-year housing supply target by supporting the development of homes across a mix of tenures, thereby supporting inclusive and sustainable communities.</p> <p>The policy would support economic centres and cultural industries which enhance community services and amenity, thus supporting the development of diverse and sustainable communities.</p>	The policy could refer to the protection and enhancement of existing specialist housing, ensuring they are of a high standard, fit for purpose and maintained where there is demand.
<b>Economy</b>	+	Policy SP 4.2 would deliver sustainable and resilient economic centres by providing a variety of economic opportunities in industrial, commercial, creative and night-time economies, as well as delivering affordable workspaces. Maintaining industrial sites and uses would also provide positive economic impacts for relevant businesses. This policy could also have a positive impact on London's economy by increasing industrial output.	The policy could include reference to support minority, green businesses and social enterprises.
<b>Education and skills</b>	0	Whilst some uses may provide training and learning opportunities for people which could result in an upskilling within the Ealing economy, the policy would not directly affect educational provision in the borough.	The policy could make reference to the provision of training opportunities, which would contribute towards an inclusive economy.
<b>Health</b>	+	The policy would support several health determinants associated with the built environment and socio-economic factors, such as increased employment opportunities and active travel opportunities. The policy commits to delivering quality, affordable homes which support inclusive communities and would provide residents with homes which support both good physical and mental health.	
<b>Connectivity</b>	+	Policy SP 4.2.H recognises the opportunity for better local connectivity by maximising the economic benefits of the Heathrow expansion. Through the Infrastructure Delivery Plan, stated in Policy SP 4.1.F.II the policy could also encourage connectivity with sustainable forms of transport, including active travel and the use of public transport.	

Objective	Score	Assessment	Mitigation / Recommendations
<b>Air quality and noise</b>	+	Policy SP 4.1.A is likely to contribute towards meeting this objective as well-connected sustainable transport modes should encourage a reduction in private vehicle use and associated emissions. Additionally, new social infrastructure should be placed in appropriate locations, as poor air quality and high noise levels can have greater impacts on more vulnerable groups who may be using these services.	The policy could make reference to ensuring new housing developments are accessible via public transport or active travel routes.
<b>Resources and land use</b>	+	The policy strongly supports the protection and intensification of industrial land, which would positively contribute to both the local and London economy. It also notes the potential for mixed-intensification, further supporting the efficient use of land in Ealing.	
<b>Historic environment, culture and townscape</b>	+	The policy actively supports cultural industries and where appropriate will use heritage-led regeneration and development which would preserve Ealing's built heritage.  Appropriately locating tall buildings will also help maintain the local character.	The policy could include measures to encourage sensitive design that limits visual intrusion of industrial sites according to local character.
<b>Biodiversity and Green Infrastructure</b>	0	The maintenance of industrial land and delivery of housing is unlikely to make a significant contribution towards this objective, but new development, particularly on a large scale, should seek opportunities to increase access to nature and open spaces, facilitated through good design and planning requirements, such as biodiversity net gain.	The policy could include specific measure to support green infrastructure across Ealing, such as the requirement for the provision of on-site biodiversity.
<b>Water environment</b>	0	The maintenance and reuse of existing industrial land does not allow for areas at high risk of flooding to be avoided. However, it may offer the chance to enhance groundwater quality on brownfield sites through remediation of contamination sources. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	
<b>Climate change mitigation</b>	+	Development of an industrial site is likely to result in carbon emissions. However, industrial development may facilitate investments in green technologies, equipment and infrastructure that reduce GHG emissions.	The policy could encourage measures such as sustainable construction at the development stage. It could be beneficial to favour the recycling of existing units to deliver the housings supply target and to contribute to the net zero target by 2030.

Objective	Score	Assessment	Mitigation / Recommendations
		Directing development towards sustainable locations that are well connected will encourage reduced private vehicle usage and may reduce the associated emissions.	
<b>Climate change adaptation</b>	<b>0</b>	This policy is unlikely to play a significant role in climate change adaptation.	The policy could promote sustainable, resilient design practices as part of new developments and any re-development of existing employment sites to ensure climate risk, such as flooding, are managed sufficiently at the development stage.

## 2.4.2 Town policies IIA

For Town Policy text, refer to Chapter 4 of the Local Plan.

### 2.4.2.1 Acton

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	Policy A.1.I would positively contribute to addressing the specific housing needs of Acton residents through the delivery of affordable housing. Policy A.1.E and F would support the delivery of new neighbourhood centres with mixed-uses, which enable residents to access services and amenities.	It could be beneficial to explicitly reference the types of social infrastructure that it plans to deliver. The policy could also define how appropriate levels of infrastructure would be identified, for example by reviewing annual population projections.
<b>Economy</b>	+	<p>Policy A1.B would maximise the economic opportunities presented from Acton's strategic location in relation to connectivity to Elizabeth Line and HS2 stations at Old Oak Common.</p> <p>Policy A1.H would expand and enhance the current services and employment sectors within Acton as well as intensifying uses at LSIS, increasing the number and variety of employment opportunity for residents.</p> <p>The policy would also deliver appropriate and affordable space and infrastructure for businesses to grow which is considered supportive for small and start-up businesses.</p> <p>This is further complemented by policies A.2 and A.3 which would seek for the delivery of a diversified employment offer among Acton's town centres and neighbourhood centres.</p>	Policy A.1.D could add reference to community safety in support of delivering town centres which are used day and night.
<b>Education and skills</b>	+	Policy A.1.IV would help contribute towards minimising education inequalities through delivering education, employment, and skills opportunities that support residents in the most deprived wards as part of the wider focus on improving Acton's economy and labour market conditions.	
<b>Health</b>	+	Policy A.1 would improve the general living conditions for residents across Acton through the delivery of a network of green open spaces and children's play areas as well as addressing GP capacity needs as a result	

		<p>of population growth. The policy would also help create an environment which promotes healthy active lifestyles through the provision and enhancement of green infrastructure, and active travel infrastructure.</p> <p>The policy supports a range of the wider health determinants such as good employment opportunities, access to high quality housing and environments, connectivity and social integration which can improve mental and physical health.</p> <p>This is further complemented by policies A.3, A.4 and A.5 which look to contribute to the delivery of active travel infrastructure, promoting healthy and active lifestyles and environments across Acton's town and neighbourhood centres.</p>	
<b>Connectivity</b>	+	<p>Policy A.1 would improve connectivity across Acton through the delivery of better and safer public transport connections. The policy seeks to reduce the use of private vehicle use and promote active travel routes and active travel infrastructure. This also supported by policies A.3 and A.4 which aim to deliver active travel options and routes for the respective towns and neighbourhoods within Acton.</p>	
<b>Air quality and noise</b>	+	<p>The policy would encourage active forms of travel, such as walking and cycling, which would reduce reliance on private vehicle usage, and the associated noise and emissions.</p> <p>The policy also looks to deliver new urban greening through new developments to help address poor air quality.</p>	
<b>Resources and land use</b>	+	<p>Policy A.1 would make productive use of unused TfL and National Rail land alongside railway routes to support a non-publicly accessible wildlife corridor. In addition, the policy would look to protect and intensify industrial land which would benefit the local and wider London economy.</p>	<p>The policy could include reference to promoting the use of brownfield land to increase local housing and employment land available.</p>
<b>Historic environment, culture and townscape</b>	+	<p>Policy A.1 would contribute to new development providing modern, high-quality environment which respects and preserves the heritage of Acton. The policy recognises the role of heritage in place-making and it would conserve and enhance the historic centre at Acton Town Centre through active measures including the creation of a Heritage Action Zone.</p>	<p>The policy could include wording to support the repair and protection of heritage assets, particularly those currently rated 'at risk'.</p>

<b>Biodiversity and Green Infrastructure</b>	+	Policy A.1 would improve the existing green infrastructure and deliver urban greening through new developments. The policy would deliver a number of measures to improve the connectivity of the green infrastructure network and increase public accessibility to green infrastructure	The policy could include reference to ensuring that green infrastructure can be accessed and maintained and that areas of green/open space are safe to use at all times of the day.
<b>Water environment</b>	0	<p>The policy is unlikely to have a strategic impact on avoiding development in flood zones, or to promote flood resilient design.</p> <p>The development and re-use of existing industrial land may offer the chance to enhance groundwater quality on brownfield sites.</p> <p>It is assumed that existing planning obligations would ensure flood risk and water resources are managed sufficiently at the development stage.</p>	The policy could include measures to encourage the use of flood resilient design measures including SuDS.
<b>Climate change mitigation</b>	+	Policy A.1 would improve the overall reliance on private vehicles through the delivery of active travel routes and improved access to public transport network thus encouraging the shift to more sustainable modes of transport and reducing the local built environment's contribution to CO <sub>2</sub> emissions.	This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.
<b>Climate change adaptation</b>	+	Policy A.1 includes the improvement of green spaces. This could potentially reduce exacerbating flood risk in these areas by minimising new development. The policy would result in the delivery of targeted green infrastructure and public realm improvements which would build resilience to future climate related events.	This policy could include measures to encourage resilience as part of good design.

### 2.4.2.2 Ealing

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	<p>Policy E.1.B recognises that growth in Ealing presents an opportunity to deliver more affordable housing. The provision of such housing would positively impact Ealing Town's more vulnerable groups in particular. Policies E.2.A and E.2.B would additionally address the town's housing need by delivering high density residential growth.</p> <p>It is considered that communities would also benefit from the social infrastructure and community infrastructure that Policies E.2.C.VII, E.3.I and E.4.II would enhance.</p>	<p>Whilst Policy E.1.B recognises the importance of delivering affordable housing, it does not actually commit to its provision. As such, it could be beneficial for Policies E.2.A and E.2.B to make reference to affordability.</p> <p>It could also be beneficial for Policies E.2.C.VII, E.3.I and E.4.II to explicitly reference the types of social and community infrastructure that it plans to improve. These policies could also define how appropriate levels of infrastructure would be identified, for example by reviewing annual population projections.</p>
<b>Economy</b>	+	<p>Policies E.1.B and E.2.A recognise the important role of high value employment-led growth in driving Ealing town's economy. Policy E.2.B would improve Ealing town's economy by delivering strategic office, commercial and retail growth. The provision of a variety of employment land is considered to foster a sustainable economy that offers employment to all. Policy E.2.C.IV would maintain and enhance Ealing Metropolitan Town Centre by providing affordable work space. This would improve access to employment opportunities by minimising financial barriers.</p>	<p>As well as referencing the delivery of high value employment, Policies E.1.B and E.2.A could also make reference to the provision of support to minority, small, local and/or green businesses, and social enterprises.</p>
<b>Education and skills</b>	+	<p>Policy E.1.B seeks to strengthen Ealing Broadway's economic identity as a hub for well-paid, knowledge-intensive jobs. This would result in a significant upskilling within the area and provide a multitude of meaningful training opportunities. Depending on which type of social infrastructure would be improved, Policy E.2.C.VII could also deliver educational benefits.</p>	<p>It could be beneficial for Policy E.2.C.VII to explicitly reference the types of social infrastructure that it aims to improve. The policy could also define how appropriate levels of infrastructure would be identified, for example by reviewing annual population projections.</p>
<b>Health</b>	+	<p>Policies E.1.B, E.1.C, E.1.C.III, E.1.C.V, E.2.C.VI, E.3.III, E.4.II would lead to health improvements across the town by encouraging active travel. Policy E.2.B would directly improve health in Ealing town by improving key health determinants, such as accessibility to and the provision of healthcare facilities. Depending on which type of social infrastructure would be improved, Policy E.2.C.VII could also deliver health benefits. Lastly, Policy E.3.I would enhance health across Northern Ealing by enhancing the area's</p>	<p>Policy E.1.C.V makes reference to cycle safety. It could be beneficial for all other active travel-related policies to also make explicit reference to safety, as well as accessibility for all.</p> <p>It could be beneficial for Policy E.2.C.VII to explicitly reference the types of social infrastructure that it plans to improve. The policy could also define how appropriate</p>



		leisure infrastructure which would encourage the adoption of healthier lifestyles.	levels of infrastructure would be identified, for example by reviewing annual population projections.
<b>Connectivity</b>	+	Policies E.1.B, E.1.C.III, E.1.C.V, E.2.C.VI, E.3.III, E.4.II would enhance connectivity across the town by encouraging active travel. Policy E.1.C.IV would also improve connectivity in Ealing by improving road infrastructure.	Policy E.1.C.V makes reference to cycle safety. It could be beneficial for all other active travel-related policies to also make explicit reference to safety, as well as affordability and accessibility for all.
<b>Air quality and noise</b>	+	Policies E.1.B, E.1.C.III, E.1.C.V, E.2.C.VI, E.3.III, E.4.II would lead to improvements in air quality and noise across the town by encouraging active travel, and thus reducing reliance on private vehicle usage. Policy E.2.B also commits to improving air quality within the town centre.	
<b>Resources and land use</b>	+	Policy E.3.IV would have a positive effect on resources and land use by optimising use of Hanger Lane Gyratory Strategic Industrial Location by redesignating it as a Locally Significant Industrial Site.	This policy could include acknowledgement that developing industrial and brownfield sites will require remediation works.
<b>Historic environment, culture and townscape</b>	+	Policies E.2.C.I, E.3.II and E.4.II would have a positive effect on Ealing's Historic environment, culture and townscape by taking a character-led approach to development that strengthens the Town's local character.	The policy could include wording to support the repair and protection of heritage assets, particularly those currently rated 'at risk'.
<b>Biodiversity and Green Infrastructure</b>	+	Policies E.1.C.II and E.1.C.VI would have a positive effect on biodiversity by delivering increased urban greening and upgrading existing wildlife corridors, respectively.	
<b>Water environment</b>	+	The urban greening and enhanced wildlife corridors delivered by Policies E.1.C.II and E.1.C.VI could lead to improvements in water quality across Ealing town. The addition of vegetation in the town may also increase rates of interception, which may reduce the risk of surface water flooding.	The policy could include measures to encourage the use of flood resilient design measures including SuDS.
<b>Climate change mitigation</b>	+	Policies E.1.B, E.1.C.III, E.1.C.V, E.2.C.VI, E.3.III, E.4.II would contribute to the mitigation of climate change by reducing reliance on private vehicle usage by encouraging active travel.	This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.
<b>Climate change adaptation</b>	+	Urban greening delivered by Policy E.1.C.II could have a cooling effect which would reduce the effects of overheating that occurs as a consequence of climate change.	This policy could include measures to encourage resilience as part of good design.

### 2.4.2.3 Greenford

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	Policy G.1 would improve the diversification of housing provision in the district centre which contributes to the delivery of a resilient mixed-use centre, helping reduce overcrowding and homelessness issues. The policy would also contribute to the delivery of higher density and higher quality developments around Greenford Station, which is also reinforced by Policy G.5.	Policy could include reference to balancing the delivery of housing, employment and retail uses within the town centre to avoid overconcentration of particular uses in the town centre.  It could also be beneficial to explicitly reference the types of social infrastructure that it plans to deliver. The policy could also define how appropriate levels of infrastructure would be identified, for example by reviewing annual population projections.
<b>Economy</b>	+	Policy G.1 would contribute of the delivery of resilient and sustainable economic centres across Greenford. The policy would deliver a good range of employment opportunities, including appropriate and affordable space and infrastructure for businesses to grow which is considered supportive for small and start-up businesses.  Furthermore, Policy G.1 would deliver more diverse employment opportunities beyond the existing dominant sectors in Greenford which results in a resilient local economy. This is further complemented by policies G.3, G.4 and G5 which also seek to deliver diversified employment among Greenford's town centres and neighbourhood centres.  Policy G.2 supports the expansion of a safe night-time economy in Greenford Town Centre for all users.	
<b>Education and skills</b>	0	The policy would not directly affect educational provision in the borough. However, Policy G.1 could help contribute towards minimising education inequalities through improved connectivity to schools and education facilities.	Policy G.1 could include wording around encouraging education and training programmes to support the growth of the local economy.
<b>Health</b>	+	Policy G.1 would improve the general health conditions for residents across Greenford through the delivery of easily accessible, connected and fit-for-purpose health and community facilities. The policy would help create an environment which promotes healthy active lifestyles through the provision	

		<p>and enhancement of green and blue infrastructure, and active travel infrastructure.</p> <p>The policy supports a range of the wider health determinants such as good employment opportunities, access to high quality housing and environments, connectivity and social integration.</p> <p>This is further complemented by policies G2, G3, G4 and G5 which look to contribute to the delivery of active travel infrastructure, promoting healthy and active lifestyles and environments across Greenford's town and neighbourhood centres.</p>	
<b>Connectivity</b>	+	<p>Policy G.1 provides a strong focus on improving connectivity across Greenford through delivery of better and safer public transport connections. The policy seeks to reduce the use of private vehicle use through the delivery of active travel routes, also supported by policies G2, G3, G4 and G5 which look to deliver active travel options and routes for the respective towns and neighbourhoods in Greenford.</p>	The policy could consider the connectivity of Greenford with other towns in the borough.
<b>Air quality and noise</b>	+	<p>The policy would encourage forms of active travel, such as walking and cycling, which would reduce reliance on private vehicle usage, and the associated noise and emissions.</p> <p>The policy also looks to deliver new urban greening through new developments to help address poor air quality.</p>	
<b>Resources and land use</b>	+	<p>Policy G2 would help improve land optimisation for development opportunities in Greenford Town Centre through restoring long-vacant properties back into use.</p>	The policy could include reference to promoting the use of brownfield land as a way to increase the sustainable delivery and expansion of the local employment sites.
<b>Historic environment, culture and townscape</b>	+	<p>Policy G.1 would contribute to the delivery of measures to secure the future repair, reuse and long-term survival of heritage assets across Greenford. Policy G.2 will provide modern, high-quality environments which respect and preserve the heritage of Greenford Town Centre.</p>	The policy could include wording to support the repair and protection of heritage assets, particularly those currently rated 'at risk'.
<b>Biodiversity and Green Infrastructure</b>	+	<p>Policy G1 would improve the existing green infrastructure and deliver urban greening through new developments. The policy would deliver a number of measures to improve the connectivity of, and public accessibility to, the blue and green infrastructure network.</p>	

<b>Water environment</b>	+	<p>The policy seeks to improve existing blue infrastructure and deliver improved accessibility for public.</p> <p>It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.</p>	<p>The policy could include measures to encourage the use of flood resilient design measures including SuDS. This would be particularly relevant in the river corridor areas of the borough.</p>
<b>Climate change mitigation</b>	+	<p>Policy G.1 would reduce reliance on private vehicles through the delivery of active travel routes and improved access to public transport network thus encouraging the shift to more sustainable modes of transport.</p>	<p>This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.</p>
<b>Climate change adaptation</b>	+	<p>Policy G.1 includes the improvement of green and blue spaces, including the Grand Union Canal and River Brent. This could potentially reduce exacerbating flood risk in these areas by minimising new development. The policy would result in the delivery of targeted green infrastructure and public realm improvements which would build resilience to future climate related events.</p>	<p>This policy could include measures to encourage resilience as part of good design.</p>

#### 2.4.2.4 Hanwell

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	<p>Policy H1 will support mixed-use centres by maximising the new Elizabeth Line to enhance Hanwell centre and the current community services.</p> <p>Policy H.1 would also help address the housing need within Hanwell by providing a range of housing types, including affordable housing and specialist housing alongside the supporting social infrastructure.</p>	<p>New residential developments should consider resident access to public or active transport routes, especially in the south of Hanwell where there is greater dependency on local bus routes and private vehicle use.</p> <p>It could also be beneficial to explicitly reference the types of social infrastructure that it plans to improve. The policy could also define how appropriate levels of infrastructure would be identified, for example by reviewing annual population projections.</p>
<b>Economy</b>	+	<p>Policy H.1 and H.2 would expand the current services and employment within Hanwell Town Centre as well as provide a variety of economic opportunities as part of the masterplan-led intensification of LSIS.</p> <p>Policy H.1 also highlights the importance of local services and inclusive economic growth that will help reduce Hanwell's dependence on a small number of large public sector employers and relatively low-paid primary employment and would encourage more diverse businesses.</p>	<p>The policy could include reference to affordability and the provision of support to minority, small, local and/or green businesses, and social enterprises.</p>
<b>Education and skills</b>	0	<p>Whilst the increase in employment opportunities may provide some training and learning opportunities for people, the policy would not directly affect educational provision in the borough.</p>	<p>The policy could look at how attracting younger working population could be accompanied by an increase in training opportunities.</p>
<b>Health</b>	+	<p>As good employment is a key health determinant, Policies H.1 and H.2 would have some mental and physical health benefits. Policy H.1F will also support this objective by providing an integrated network of active travel routes and a broader pedestrian network. This would create an environment which promotes healthy and active lifestyles.</p>	
<b>Connectivity</b>	+	<p>Policy H.1F will also support this objective by providing an integrated network of active travel routes and a broader pedestrian network which aims to reduce the severance across the borough, particularly regarding north-south connectivity and between the north of Hanwell and Greenford.</p>	

		The policy also includes investing in new active travel infrastructure aligning with the borough-wide aim to support a shift away from car-based movements.	
<b>Air quality and noise</b>	+	Policy H.1 recognises the importance of protecting and enhancing green, open spaces which would provide areas within the urban environment further from sources of noise or poor air quality, such as industry or roads. It would also provide quiet spaces for people, supporting wider health benefits. This policy also encourages public and active travel routes which would reduce private vehicle use and have a beneficial impact on local emissions.	
<b>Resources and land use</b>	+	Policies H.1E supports the objective of developing and intensifying industrial land at Trumper's Way LSIS and a SIL north of the Hospital. This will positively contribute to the local and London economy.	This policy could include measures to ensure the remediation of any contaminated land prior to development.
<b>Historic environment, culture and townscape</b>	+	Policy H.1D and E will deliver design that promotes heritage assets and maximise opportunities for heritage-led regeneration around Trumper's Way/Grand Union Canal and the Wharncliffe Viaduct. Policy H.2A will implement character-led intensification around Hanwell town centre, helping to enhance the character of Hanwell. It is anticipated that the significance of historic environment assets and their setting would be protected via relevant planning obligations.	The policy could include measures to encourage sensitive design that limits visual intrusion of developments according to local character.  The policy could also include wording to support the repair and protection of heritage assets, particularly those currently rated 'at risk'.
<b>Biodiversity and Green Infrastructure</b>	+	Policy H.1G would protect and enhance green and blue infrastructure across Hanwell, benefiting local biodiversity, alongside facilitating opportunities for people to access nature and blue and green spaces.	
<b>Water environment</b>	0	<p>The policy is unlikely to have a strategic impact on avoiding development in flood zones, or to promote flood resilient design. Although recognising the importance of public open space and the canal network may lead to improvements in watercourse quality.</p> <p>The maintenance or re-use of existing industrial land may offer the chance to enhance groundwater quality on brownfield sites.</p> <p>It is assumed that existing planning obligations would ensure flood risk and water resources are managed sufficiently at the development stage.</p>	The policy could include measures to encourage the use of flood resilient design measures including SuDS. This would be particularly relevant in the river corridor areas of the borough.

<b>Climate change mitigation</b>	+	Policy H.1 supports this objective as it would invest in and facilitate active travel routes for pedestrians and cyclists across Hanwell, reducing the local built environment's contribution to CO <sub>2</sub> emissions.	This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.
<b>Climate change adaptation</b>	+	Policy H.1 includes the protection of green and blue spaces, including Elthorne Park and the network of spaces around the River Brent and Grand Union Canal. This would potentially reduce exacerbating flood risk in these. Large areas of open space can also provide cooler areas of shade and alleviate urban heat island effects.	This policy could include measures to encourage resilience as part of good design.



### 2.4.2.5 Northolt

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	Policy N.1A and C would improve the quality and accessibility of selected housing estates and directly support mixed-use centres which enhance community services and amenity, supporting the development of diverse and sustainable communities.	It could be beneficial to explicitly reference the types of social infrastructure that it plans to deliver. The policy could also define how appropriate levels of infrastructure would be identified, for example by reviewing annual population projections.
<b>Economy</b>	+	<p>The development and intensification of industrial and commercial uses, through Policy N.1, would provide employment opportunities for local residents and deliver sustainable and resilient economic centres through the provision of affordable workspace. By providing affordable workspaces, Northolt will continue to be an attractive area for business start-ups and create further opportunities for growth and employment.</p> <p>Modernising industrial sites and uses, in Policy N.1D, would also provide positive economic impacts for relevant businesses and have a positive impact on London's economy by increasing industrial output.</p>	
<b>Education and skills</b>	0	Whilst some uses may provide training and learning opportunities for people which could result in an upskilling within the Ealing economy, the policy would not directly affect educational provision in the borough.	The policy could include wording around providing workspaces to encourage education and training programmes to support the growth of the local economy.
<b>Health</b>	+	<p>The provision of new businesses and amenities would improve mental health and wellbeing by supporting various determinants of health.</p> <p>Policy N.1F promotes green infrastructure creating an environment which promotes healthy and active lifestyles by providing space for exercise, recreation or relaxation.</p>	
<b>Connectivity</b>	+	Policies N.1E and F strongly support this objective by reinforcing north-south connectivity within Northolt and improving transport connections between Ealing towns and other key destinations. The policy also encourages active forms of transport by providing safer, more convenient spaces for walking and cycling.	The policy could consider connecting the active travel routes to public rights of way or national cycle networks.

<b>Air quality and noise</b>	+	The policy would encourage forms of active travel, such as walking and cycling, which would reduce reliance on private vehicle usage, and the associated noise and emissions.	
<b>Resources and land use</b>	+	Policy N.1D supports the development and intensification of industrial and commercial uses and would seek to develop adjacent opportunity sites, further supporting the efficient use of land in Ealing.	
<b>Historic environment, culture and townscape</b>	+	Policy N.2A would rejuvenate the town centres through the provision of mixed commercial and leisure facilities. It is anticipated that the significance of historic environment would be protected via relevant planning requirements and design standards. Policy N.2B will preserve and reinforce the character of Northolt town centre.	The policy could include wording to support the repair and protection of heritage assets, particularly those currently rated 'at risk'.
<b>Biodiversity and Green Infrastructure</b>	+	Policy N.1F will promote green infrastructure and Policy N.2A.IV maximises the benefits of high-quality green spaces. These policies will benefit local biodiversity and facilitate opportunities for people to access nature and green spaces.	
<b>Water environment</b>	+	Policy N.1F will promote green infrastructure and enhance green routes which will incorporate measures to alleviate stormwater flooding.  Developing and improving industrial areas may offer the chance to enhance groundwater quality on brownfield sites through remediation of contamination sources. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	
<b>Climate change mitigation</b>	+	The policy would encourage forms of active travel, such as walking and cycling, and encourage more sustainable modes of transport which would support the reduction of CO <sub>2</sub> emissions.	This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.
<b>Climate change adaptation</b>	+	Policy N.1F will promote green infrastructure and enhance green routes which will incorporate measures to alleviate stormwater flooding and help avoid exacerbating flood risk.	This policy could include measures to encourage resilience as part of good design.

### 2.4.2.6 Perivale

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	<p>P.1D states Perivale will see limited levels of residential-led development. Therefore, this policy is unlikely to significantly contribute to addressing the borough's housing needs.</p> <p>However, Policies P.2 and P.3 would create a stronger sense of place and community by supporting mixed-use centres across Perivale neighbourhoods, particularly the areas near to Bilton Road and Medway Parade.</p>	The policy could include reference to providing assurance that residential development, even if on a limited scale, will consider resident accessibility to employment opportunities and public transport routes.
<b>Economy</b>	+	<p>The policy will reinforce Perivale's identity as a strong economic hub by safeguarding, intensifying and diversifying its industrial core, enhancing local shopping parades such as Medway Parade and diversifying uses at local centres such as Bilton Road.</p> <p>Policy P.1.B will improve connections between Perivale's industry to other towns within Ealing as part of the A40 Productivity Arc which could increase the number and security of employment opportunities.</p>	The policy could include reference to affordability and the provision of support to minority, small, local and/or green businesses, and social enterprises.
<b>Education and skills</b>	0	Whilst the increase in employment opportunities may provide some training and learning opportunities for people, the policy would not directly affect educational provision in the borough.	The policy could look at how attracting younger working population could be accompanied by an increase in training opportunities.
<b>Health</b>	+	As good employment is a key health determinant the policy would have some mental and physical health benefits. Policy P.1 will also support this objective by providing better links to green and blue spaces and active travel routes. This would create an environment which promotes healthy and active lifestyles.	
<b>Connectivity</b>	+	<p>Policy P.1B would maintain good levels accessibility for workers by public transport.</p> <p>Policy P.1E would support this objective by improving safe and attractive public and active travel modes which aims to reduce the severance across the borough, particularly regarding north-south connectivity. The policy will also promote a continuous active travel corridor from Perivale Park into</p>	

		Greenford and Hanwell improving connectivity between the towns. These measures would reduce reliance of private-care usage.	
<b>Air quality and noise</b>	+	<p>Policy P.1E would support safer, more attractive public and active travel modes and mitigate the severance between the north and south of the town. This would reduce reliance of private-care usage and have a beneficial impact on local emissions.</p> <p>Policy P.1F states improving public realm, greening and new green spaces will be required as part of new developments which will support this objective by helping address poor air quality.</p>	
<b>Resources and land use</b>	+	Policies P.1B supports this objective by safeguarding, intensifying and enhancing Perivale's industrial core, as well as improving the town's connection to the A40 Productivity Arc. This will positively contribute to the local and London economy.	This policy could include acknowledgement that developing industrial and brownfield sites will require remediation works.
<b>Historic environment, culture and townscape</b>	0	The policy is unlikely to have a strategic impact on the culture or historic environment of the area. However, Policy P.1F will seek to increase the attractiveness of Perivale's streetscapes which may enhance the setting of current assets.	The policy could include measures to encourage sensitive design according to local character and support the repair and protection of heritage assets, particularly those currently rated 'at risk'.
<b>Biodiversity and Green Infrastructure</b>	+	Policy P.1F will require improvements to public realm, greening and new green spaces as part of new developments which will benefit local biodiversity. Improving the connections between blue and green spaces will also benefit habitat connectivity and facilitate opportunities for people to access nature.	
<b>Water environment</b>	0	<p>The policy is unlikely to have a strategic impact on avoiding development in flood zones, or to promote flood resilient design. Although recognising the importance of public open space and the canal network may lead to improvements in watercourse quality.</p> <p>It is assumed that existing planning obligations would ensure flood risk and water resources are managed sufficiently at the development stage.</p>	The policy could include measures to encourage the use of flood resilient design measures including SuDS. This would be particularly relevant in the river corridor areas of the borough.
<b>Climate change mitigation</b>	+	Policy P.1 supports this objective as it would invest in and facilitate active travel routes for pedestrians and cyclists across Perivale, reducing the local built environment's contribution to CO <sub>2</sub> emissions.	This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable

			energy sources for cooling), as part of good design and mitigating climate change impacts.
<b>Climate change adaptation</b>	+	Policy P.1 will enhance green and blue spaces which would potentially reduce exacerbating flood risk in these areas by minimising new development. Large areas of open spaces can also provide cooler areas of shade and alleviate urban heat island effects.	This policy could include measures to encourage resilience a part of good design.

## 2.4.2.7 Southall

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	<p>Policy S.1C will feature regeneration-led development which will benefit communities with specific issues such as deprivation and poor access to community services and amenities.</p> <p>Policy S.1G will help address the housing needs of Southall by delivering more housing, facilitating inter-generational living and providing specialist housing.</p> <p>Policy S.1J notes moderate levels of development and regeneration at Golf Links Estate and Havelock Estate. This will encourage a stronger sense of place and community in these neighbourhoods.</p> <p>Policies S.4 and S.5 will also support this objective by providing genuinely affordable housing in West Southall.</p>	It could be beneficial to explicitly reference the types of social infrastructure that it plans to deliver and enhance. The policy could also define how appropriate levels of infrastructure would be identified, for example by reviewing annual population projections.
<b>Economy</b>	+	<p>Policy S.1C will capitalise on Southall's strategic location along the Ealing Productivity Arc to maximise economic opportunities.</p> <p>Policy S.1F will support the provision of employment spaces encouraging diversity and higher paying jobs as well as supporting the provision of affordable workspace in Southall.</p> <p>Policy S.2, S.3, S.4 will create employment opportunities through enhancing the mixed-use town centres.</p>	
<b>Education and skills</b>	+	<p>Policies S.4 and S.5 will provide a new primary school in West Southall and East Southall respectively.</p>	New schools should consider providing access to the site that allows staff and pupils/families to travel using safe public or active transport routes.
<b>Health</b>	+	<p>As good employment is a key health determinant policies S.1C and F support this objective and would have some mental and physical health benefits.</p> <p>Policy S.1M will add to the network of green open spaces and improve active travel routes. This would create an environment which promotes healthy and active lifestyles. The policy would also improve accessibility to primary healthcare infrastructure at Southall Jubilee Gardens and Lady</p>	

		Margaret Road medical centres as well as identifying opportunities for new health infrastructure and services.	
<b>Connectivity</b>	+	<p>Policy S.1L would support the improvement of active travel connections along north-south routes, across the railway and upgrading safe cycle routes that allow continuous travel between town centres across the borough. These measures would reduce reliance of private-car usage.</p> <p>Policies S.2 and S.4 will also improve connectivity within and between the neighbourhood centres.</p> <p>Policy S.5 would deliver an east-west active and public transport route connecting Havelock Estate and Merrick Road.</p>	
<b>Air quality and noise</b>	+	Policy S.1L would support safer, more attractive public and active travel modes and mitigate the severance between the north and south of Southall and improve connections with other towns in Ealing. This would reduce reliance of private-car usage and have a beneficial impact on local emissions.	
<b>Resources and land use</b>	+	Policy S.1F will protect strategic industrial land and LSIS to improve the long-term security of these jobs. This policy will also redesignate Charles House and Balfour Business centre as LSIS.	This policy could include measures to remediate any contaminated land prior to development.
<b>Historic environment, culture and townscape</b>	+	<p>Policy S.1M strongly supports this objective by supporting the repair and protection of currently rated 'at risk' heritage assets. The policy would also deliver growth around the two conservation areas in Southall through careful, contextual design complementary to the existing character.</p> <p>The policy would promote awareness and community cohesion which would in turn increase opportunities for people to access and enjoy the heritage assets in Southall.</p> <p>Policy S.2, S.3, S.5 will maintain and preserve the local heritage assets in Southall town centre, King Street Neighbourhood Centre and East Southall.</p>	
<b>Biodiversity and Green Infrastructure</b>	+	Policy S.1M will promote development that incorporates ecological improvements along the Grand Union Canal towpath. Policies S.4 and S.5 will provide a connected network of green and open spaces in West	



		Southall. These measures will benefit local biodiversity and will facilitate opportunities for people to access nature.	
<b>Water environment</b>	0	<p>The policy is unlikely to have a strategic impact on avoiding development in flood zones, or to promote flood resilient design.</p> <p>It is assumed that existing planning obligations would ensure flood risk and water resources are managed sufficiently at the development stage.</p>	The policy could include measures to encourage the use of flood resilient design measures including SuDS. This would be particularly relevant in the river corridor areas of the borough.
<b>Climate change mitigation</b>	+	The policy supports this objective as it would invest in and facilitate active travel routes for pedestrians and cyclists across Southall, reducing the local built environment's contribution to CO <sub>2</sub> emissions.	This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.
<b>Climate change adaptation</b>	+	<p>Policy S.1F will create green jobs through the West London College Green Skills Hub which will help encourage sustainable and resilient development in the future.</p> <p>The policy will enhance green and blue spaces which would potentially reduce exacerbating flood risk in these areas by minimising new development. Large areas of open spaces can also provide cooler areas of shade and alleviate urban heat island effects.</p>	This policy could include measures to encourage resilience a part of good design.

### 2.4.3 Development management policies IIA

The Development Management policies largely confirm to those set out in the London Plan but do vary according to local circumstances. Some of the policies are new where they better suit the strategic and spatial vision of the Ealing Local Plan. For Development Management Policy text, refer to Chapter 5 of the Local Plan.

#### 2.4.3.1 Design and Amenity

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy encourages the development of high quality housing that minimises adverse lighting, visual and privacy impacts with particular reference to residential uses. The policy would support the development of homes that are attractive and of a high standard, and therefore support sustainable communities.	
<b>Economy</b>	+	The policy is unlikely to substantially impact economic objectives in the borough. However, the policy would encourage development that is attractive and therefore support sustainable communities and create a more desirable place to live and work. It also supports new development which considers surrounding context, which can help avoid inappropriate development, such as placing noise-sensitive receptors alongside noisy-generating businesses, which can put these businesses at risk.	
<b>Education and skills</b>	0	The policy supports the protection of existing educational infrastructure within the borough, but is unlikely to lead to improvements in access or quality of provision.	
<b>Health</b>	+	The policy is likely to promote good mental health and wellbeing through the provision of high quality homes and protection of public open spaces. The policy supports the protection of existing health infrastructure within the borough, but is unlikely to lead to improvements in access or quality of provision.	The range of sensitive uses included in the policy could be expanded to include other health and social care facilities, such as care homes or day centres.
<b>Connectivity</b>	+	The policy references the importance of not creating isolated communities which would have wider benefits for connectivity across	The policy could include measures to encourage connectivity with sustainable forms of transport, as part of good design.

Objective	Score	Assessment	Mitigation / Recommendations
		Ealing, helping to manage existing severance issues, predominantly associated with linear rail and road infrastructure.	
<b>Air quality and noise</b>	+	The policy supports development that avoids and mitigates impacts from poor air quality and noise and vibration.	The policy could include measures related to air quality and noise as part of the criteria for development.
<b>Resources and land use</b>	+	The policy supports the provision of well-designed developments which avoid negative impacts on the surrounding environment.	
<b>Historic environment, culture and townscape</b>	+	The policy commits to development that complements the local context and draws on the Ealing Character Study and conservation documents. This would enhance the character of Ealing's towns and sub-areas. It is anticipated that the significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards.	
<b>Biodiversity and Green Infrastructure</b>	+	The policy actively supports the protection of public open space and nature sites.	The policy could include measures to encourage the enhancement as well as protection of sensitive uses by developers, including public open space and nature sites.
<b>Water environment</b>	0	The policy supports the avoidance and mitigation of impacts caused by development, which may include flood risk, but is unlikely to have a strategic impact on avoiding development in flood zones, or to promote flood resilient design. Although the water environment is not specifically mentioned, the policy actively supports the protection of public open space and nature sites, however, this is unlikely to lead to improvements in water quality.	The policy could include measures to encourage the use of flood resilient design measure including SUDS, as part of agent of change driven good design. This would be particularly relevant in the river corridor areas of the borough.
<b>Climate change mitigation</b>	0	Any development is likely to result in carbon emissions. The design measures and impacts referenced in the policy are unlikely to have an impact on overall emissions within the borough.	The policy could include measures to encourage connectivity with sustainable forms of transport and use of sustainable construction materials, as part of good design and mitigating climate change impacts.
<b>Climate change adaptation</b>	0	The policy supports the avoidance and mitigation of impacts caused by development, which may include flood risk, but does not actively promote flood resilient design. The policy supports the protection of public open space and nature sites, which could help avoid	The policy could include measures to encourage resilience as part of good design and promote sustainable design practices. Whilst the policy commits to meeting current design standards, it could go further to ensure new development is resilient to future climate change.

Objective	Score	Assessment	Mitigation / Recommendations
		exacerbating flood risk, and to provide cooler areas of shade and alleviate urban heat island effects.	

### 2.4.3.2 Tall Buildings

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	Tall buildings are an effective mechanism for meeting housing needs. The policy balances this requirement with the need to ensure the height of buildings is appropriate to their location, therefore supporting the development of sustainable communities. However provision of housing through tall buildings may not support the delivery of a range of home types, particularly those appropriate for more vulnerable groups.	The policy could include measures to encourage a range of appropriate housing types and tenures in addition to tall buildings and to promote tall residential buildings which are provided alongside sufficient existing or proposed community services and amenities.
<b>Economy</b>	+	The policy directs the development of tall buildings to appropriate locations within the borough. Mixed-use or commercial-led tall buildings in appropriate locations could support vibrant economic centres and attract businesses to the area.	
<b>Education and skills</b>	N/A	The policy is not considered relevant to this objective.	
<b>Health</b>	+	The policy aims to ensure the height of buildings is appropriate to their location, and therefore may promote good mental health and wellbeing through the provision of high quality environments and protection of public open spaces.	
<b>Connectivity</b>	0	Tall buildings increase population density, and in appropriate locations may therefore minimise private vehicle use and support active travel and public transport.	The policy could include measures to promote tall buildings which are provided alongside sufficient existing or proposed community services and amenities, and to encourage connectivity with sustainable forms of transport.
<b>Air quality and noise</b>	0	Tall buildings increase population density, and in appropriate locations may minimise private vehicle use and support active travel and public transport, therefore providing an opportunity to reduce poor air quality. However in certain locations they may also substantially increase the numbers of people exposed to poor air quality and high noise levels.	The policy could include measures to encourage connectivity with sustainable forms of transport, and to consider a wider range of criteria for appropriateness of location beyond local character, e.g. air quality and noise.
<b>Resources and land use</b>	+	Tall buildings are an effective mechanism for land use in the delivery of high proportions of residential or commercial units.	

Objective	Score	Assessment	Mitigation / Recommendations
<b>Historic environment, culture and townscape</b>	+	The policy protects local character by restricting the development of tall buildings to certain development plots, and providing a variable definition of 'tall' dependent on area. Well-designed tall buildings have the opportunity to create local landmarks and attractive destinations (such as viewing platforms) which can positively contribute to an area if the design is sensitive to the surrounding landscape. It is anticipated that the significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards, as noted in the policy.	The policy could include measures to encourage sensitive design that limits visual intrusion of tall buildings according to local character.
<b>Biodiversity and Green Infrastructure</b>	0	Tall buildings are an effective mechanism for land use, and therefore the policy may indirectly support the protection of open space but is unlikely to lead to improvements in access or quality. It is anticipated that any biodiversity present or in proximity to a site would be protected via relevant planning requirements and design standards.	
<b>Water environment</b>	0	The policy is unlikely to have a strategic impact on avoiding development in flood zones, or to promote flood resilient design. Although the water environment is not specifically mentioned, the policy may indirectly support the protection of public open space and natural sites through effective land use, however, is unlikely to lead to improvements in watercourse quality. Tall buildings may have deep basements which could impact groundwater quality.	The policy could include measures to encourage the use of flood resilient design measure including SUDS. This would be particularly relevant in the river corridor areas of the borough.
<b>Climate change mitigation</b>	-	Tall buildings are inherently large and usually new build developments which are likely to result in carbon emissions. They also typically require mechanical cooling systems, have limited roof space in proportion to the floor area constraining BeGreen savings and therefore can use a substantial amount of energy to operate. Therefore, the policy does not support the objective of reducing CO <sub>2</sub> emissions. Tall buildings may also increase the urban density in an area, exacerbating issues such as the urban heat island effect. Tall buildings increase population density, however in appropriate locations may minimise private vehicle use and support active travel and public transport.	<p>The policy could include measures to encourage connectivity with sustainable forms of transport and use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.</p> <p>The policy could also seek to identify what is the optimum height of tall building from a sustainability and carbon emissions perspective.</p>

Objective	Score	Assessment	Mitigation / Recommendations
<b>Climate change adaptation</b>	<b>0</b>	Tall buildings are an effective mechanism for land use, and therefore the policy may indirectly support the protection of public open space and nature sites which could help avoid exacerbating flood risk, and to provide cooler areas of shade.	The policy could include measures to encourage climate change resilient design and promote sustainable design practices.

### 2.4.3.3 Affordable Housing

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	<p>The policy strongly supports this objective as the affordable housing provision will be based upon London Plan targets and comprise an appropriate mix of tenures and unit sizes.</p> <p>The policy also states that developments which adversely effects affordable housing provision will be refused.</p>	The policy could stipulate a higher level of affordable housing to better meet local housing need.
<b>Economy</b>	0	The policy would not directly support this objective but providing affordable housing could mean people will be able to spend more money in the local economy beyond basic needs. This may support the local retail, leisure and entertainment businesses.	
<b>Education and skills</b>	0	The policy would not directly affect educational provision in the borough.	
<b>Health</b>	+	Housing is a significant determinant of health. Therefore, providing affordable housing is likely to contribute to healthy outcomes for the mental and physical health of the community.	The policy could make reference to supporting high quality housing that is adaptable to meeting changing needs and promotes stable communities.
<b>Connectivity</b>	0	The policy would not directly contribute towards improvements to connectivity or minimising private vehicle use, but placing affordable housing in appropriate, well-connected locations which are accessible via sustainable forms of transport should be supported.	The policy could support affordable housing which is well-connected to the public transport network.
<b>Air quality and noise</b>	N/A	The policy is not considered relevant to this objective.	The policy could make reference to placing the affordable housing developments away from areas with poor air quality and noise pollution.
<b>Resources and land use</b>	0	The delivery of affordable housing is unlikely to make a significant contribution towards this objective, but benefits would arise where housing is delivered on brownfield land or through the reuse or redevelopment of existing buildings.	The policy could reference the recycling of existing residential units for the provision of affordable housing.
<b>Historic environment,</b>	0	The delivery of affordable housing is unlikely to make a significant contribution towards this objective and it is anticipated that the	



Objective	Score	Assessment	Mitigation / Recommendations
<b>culture and townscape</b>		significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards.	
<b>Biodiversity and Green Infrastructure</b>	0	The policy is not considered relevant to this objective.	<p>The provision of affordable housing should incorporate biodiversity measures to improve the local environment.</p> <p>The policy could support affordable housing which is located close to open and green space which will benefit the health and quality of life of residents.</p>
<b>Water environment</b>	0	Affordable housing is unlikely to contribute to flood risk and water environment objectives in the borough. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	The policy could include measures to encourage the use of flood resilient design measures including SuDS, as part of good design. This would be particularly relevant in the river corridor areas of the borough.
<b>Climate change mitigation</b>	0	Placing housing in appropriate, well-connected locations which are accessible via sustainable forms of transport should be supported to reduce private vehicle reliance and associated emissions.	<p>The policy could support affordable housing which is well-connected to the public transport network.</p> <p>This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.</p>
<b>Climate change adaptation</b>	0	Affordable housing is unlikely to play a significant role in climate change adaptation. It is assumed that existing planning requirements and design standards would ensure climate risk, such as flooding, are managed sufficiently at the development stage.	This policy could include measures to encourage the implementation of climate change resilient design such as solar screens and insulation.

#### 2.4.3.4 Large Scale Purpose Built Shared Living

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy supports the objective of meeting housing targets by permitting the development of large-scale residential buildings within Ealing Metropolitan Town Centre.	
<b>Economy</b>	0	The policy would not directly affect the local economy or employment opportunities.	
<b>Education and skills</b>	0	The policy would not directly affect educational provision in the borough.	
<b>Health</b>	+	The policy supports this objective as it will help meet the housing needs of LB Ealing. Housing is a key health determinant, for both physical and mental health and therefore will likely have positive impacts on the residents.	The policy could include reference to ensuring existing health care facilities can accommodate the increase in local population or that expansion to health care provision will be implemented.
<b>Connectivity</b>	+	The location of large scale purpose built living within Ealing town centre would capitalise on existing good levels of connectivity especially via public transport.	The policy could include reference to ensuring the public transport infrastructure includes active travel options.
<b>Air quality and noise</b>	+	By ensuring that the large-scale, shared living accommodation is located close to public transport links, it encourages the use of public transport rather than private vehicles which may lead to a reduction in emissions.	
<b>Resources and land use</b>	+	The policy supports this objective as the conversion of existing buildings is an efficient use of land.	
<b>Historic environment, culture and townscape</b>	0	By only permitting large-scale, purpose-built accommodation within Ealing Metropolitan Town Centre, the policy respects the character of other neighbourhoods and town centres within the borough.	
<b>Biodiversity and Green Infrastructure</b>	0	The policy would not directly affect biodiversity or green infrastructure in the borough.	The policy should require the provision of biodiversity measures into existing buildings being adapted for Large Scale Purpose Built Shared Living.

Objective	Score	Assessment	Mitigation / Recommendations
<b>Water environment</b>	<b>0</b>	The policy is unlikely to contribute to flood risk and water environment objectives in the borough.	Opportunities for Sustainable Urban Drainage Schemes should be pursued in all adaptation schemes.
<b>Climate change mitigation</b>	<b>0</b>	The policy would encourage the use of public transport which may lead to a reduction in the local CO <sub>2</sub> emissions, but this is unlikely to have an impact on overall emissions within the borough.	The policy could encourage the adaptation of existing buildings over new build developments as this would likely result in lower CO <sub>2</sub> emissions.
<b>Climate change adaptation</b>	<b>0</b>	The policy would not directly contribute to this objective. However, any new developments should be built to be resilient from the impacts if climate change.	

### 2.4.3.5 Small Sites contribution

Objective	Score	Assessment	Mitigation / Recommendations
Housing and communities	+	The policy supports the objective as it will help address the borough's needs of increasing affordable housing provision.	The policy could make reference to supporting high quality housing.
Economy	+	Supporting the provision of affordable housing means people will be able to spend more money in the local economy beyond basic needs. This may support the local retail, leisure and entertainment businesses.	
Education and skills	0	The policy would not directly affect educational provision in the borough.	
Health	+	Housing is a significant determinant of health. Therefore, providing affordable housing is likely to contribute to healthy outcomes for the mental and physical health of the community.	The policy could make reference to supporting high quality housing that is adaptable to meeting changing needs and promotes stable communities.
Connectivity	0	The policy would not directly contribute towards improvements to connectivity or minimising private vehicle use, but placing affordable housing in appropriate, well-connected locations which are accessible via sustainable forms of transport should be supported.	The policy could support affordable housing which is well-connected to the public transport network.
Air quality and noise	N/A	The policy is not considered relevant to this objective.	The policy could make reference to placing the affordable housing developments away from areas with poor air quality and noise pollution.
Resources and land use	0	The delivery of affordable housing is unlikely to make a significant contribution towards this objective, but benefits would arise where housing is delivered on brownfield land or through the reuse or redevelopment of existing buildings.	The policy could reference the recycling of existing residential units for the provision of affordable housing.
Historic environment, culture and townscape	0	The delivery of affordable housing is unlikely to make a significant contribution towards this objective and it is anticipated that the significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards.	
Biodiversity and Green Infrastructure	0	The policy is not considered relevant to this objective.	The provision of affordable housing should incorporate biodiversity measures to improve the local environment.

Objective	Score	Assessment	Mitigation / Recommendations
			The policy could support affordable housing which is located close to open and green space which will benefit the health and quality of life of residents.
<b>Water environment</b>	<b>0</b>	Affordable housing is unlikely to contribute to flood risk and water environment objectives in the borough. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	The policy could include measures to encourage the use of flood resilient design measures including SuDS, as part of good design. This would be particularly relevant in the river corridor areas of the borough.
<b>Climate change mitigation</b>	<b>0</b>	Placing housing in appropriate, well-connected locations which are accessible via sustainable forms of transport should be supported to reduce private vehicle reliance and associated emissions.	<p>The policy could support affordable housing which is well-connected to the public transport network.</p> <p>This policy could include measures to encourage the use of sustainable construction materials and sustainable operating systems (such as renewable energy sources for cooling), as part of good design and mitigating climate change impacts.</p>
<b>Climate change adaptation</b>	<b>0</b>	Affordable housing is unlikely to play a significant role in climate change adaptation. It is assumed that existing planning requirements and design standards would ensure climate risk, such as flooding, are managed sufficiently at the development stage.	This policy could include measures to encourage the implementation of climate change resilient design such as solar screens and insulation.

### 2.4.3.6 Affordable Workspace

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy would support economic centres which enhance community services and amenity, thus supporting the development of diverse and sustainable communities.	
<b>Economy</b>	+	The policy would provide a variety of economic opportunities and deliver sustainable and resilient economic centres through the provision of affordable workspace, which would particularly benefit small, start-up, local and minority-owned businesses. The policy would also support businesses through more difficult economic conditions.	
<b>Education and skills</b>	+	The policy would increase employment opportunities within the borough, which would likely result in an upskilling within Ealing's economy.	The policy could make reference to providing workspace which also supports training and educational opportunities.
<b>Health</b>	+	Good employment is a key health determinant and therefore the provision of a range of workspaces, including affordable opportunities, is likely to contribute to healthy outcomes.	The policy could make reference to supporting businesses that focus on improving the health of its customers, such as healthy food establishments or fitness clubs.
<b>Connectivity</b>	0	The policy would not directly contribute towards improvements to connectivity or minimising private vehicle use, but placing workspaces in appropriate, well-connected locations which are accessible via sustainable forms of transport should be supported.	The policy could support affordable workspaces which are well-connected to the public transport network.
<b>Air quality and noise</b>	0	The provision of affordable workspace could support a range of businesses which may have impacts on local amenity in relation to noise and emissions. However, the requirement to demonstrate that the space is suitable and will be appropriately managed is a key mechanism which should help to minimise impacts.	The policy could include wording to encourage proposed uses which are suitable within the surrounding context.
<b>Resources and land use</b>	0	The delivery of affordable workspace is unlikely to make a significant contribution towards this objective, but benefits would arise where infrastructure is delivered on brownfield land or through the reuse or redevelopment of existing buildings.	The policy could reference the recycling of existing units for the provision of affordable workspace.
<b>Historic environment,</b>	0	The delivery of affordable workspace is unlikely to make a significant contribution towards this objective and it is anticipated that the	

Objective	Score	Assessment	Mitigation / Recommendations
<b>culture and townscape</b>		significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards.	
<b>Biodiversity and Green Infrastructure</b>	<b>N/A</b>	The policy is not considered relevant to this objective.	
<b>Water environment</b>	<b>0</b>	Affordable workspace is unlikely to contribute to flood risk and water environment objectives in the borough. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	
<b>Climate change mitigation</b>	<b>0</b>	Placing workspaces in appropriate, well-connected locations which are accessible via sustainable forms of transport should be supported to reduce private vehicle reliance and associated emissions.	The policy could support affordable workspaces which are well-connected to the public transport network.
<b>Climate change adaptation</b>	<b>0</b>	Affordable workspace is unlikely to play a significant role in climate change adaptation. It is assumed that existing planning requirements and design standards would ensure climate risk, such as flooding, are managed sufficiently at the development stage.	

### 2.4.3.7 Land for Industry, Logistics and Services to support London's economic function

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy supports industrial intensification and the reuse of existing sites as the primary source of industrial land. However the policy does support mixed-intensification where appropriate industrial/employment uses would complement other uses, including housing, although these sites would prioritise industrial provision over affordable housing in the first instance.	
<b>Economy</b>	+	This policy would provide economic opportunities by supporting the redevelopment of available sites will follow an employment-led approach. Where mixed-intensification is suitable a greater range of employment opportunities could be available.	The policy could include reference to the provision of affordable industrial, or (where applicable) housing units, and also support to minority, small, local and/or green businesses, and social enterprises.
<b>Education and skills</b>	0	Whilst some uses may provide training and learning opportunities for people, the policy would not directly affect educational provision in the borough.	
<b>Health</b>	+	The reuse and intensification of industrial land is unlikely to make a significant contribution towards this objective, but as good employment is a key health determinant, the policy would have some mental and physical health benefits in Ealing. Additionally, where mixed-intensification is suitable, additional housing, services and opportunities would further support other health determinants.	
<b>Connectivity</b>	0	The policy would not directly contribute towards improvements to connectivity or minimising private vehicle use, but placing new industrial provision in well-connected locations which are accessible via sustainable forms of transport should be supported.	This policy could directly refer to delivering well-connected uses, particularly where mixed-intensification is proposed.
<b>Air quality and noise</b>	0	Mixed-intensification may result in adverse impacts on new development where uses are not appropriate, for example placing noise-generating businesses near noise-sensitive receptors. The policy promotes conforming uses where sites contain are mixed, which should reduce the risk of locating opposing uses in proximity to each other.	The policy could commit to good master planning design and consideration of the local environment, as acknowledge in the Locally Significant Industrial Sites policy.



Objective	Score	Assessment	Mitigation / Recommendations
<b>Resources and land use</b>	<b>+</b>	The policy strongly supports efficient land use through the protection and intensification of industrial land, alongside the reuse of existing sites. It also identifies the availability of mixing complementary uses, increasing the potential of industrial sites.	
<b>Historic environment, culture and townscape</b>	<b>0</b>	Maintaining industrial land and delivering new sites is unlikely to contribute towards this objective. However, it is anticipated that the significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards.	
<b>Biodiversity and Green Infrastructure</b>	<b>0</b>	As sites would be designated for industrial or mixed-intensification uses, this policy is unlikely to substantially support/provide biodiversity or green infrastructure. Owing to the provision of appropriate planning requirements and design standards, it is anticipated that any biodiversity present or in proximity to a site would be protected.	
<b>Water environment</b>	<b>0</b>	The maintenance and reuse of existing sites does not allow for areas at high risk of flooding to be avoided. However, it may enhance groundwater quality on brownfield sites through remediation of contamination sources. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	
<b>Climate change mitigation</b>	<b>0</b>	Development of an industrial site is likely to result in carbon emissions. However, industrial development may facilitate investments in green technologies, equipment and infrastructure that reduce GHG emissions.	
<b>Climate change adaptation</b>	<b>0</b>	Considered development or re-use of industrial land and existing planning requirements and design standards could support land and buildings which are able to withstand the potential future impacts of climate change and risks such as flooding are managed sufficiently at the development stage.	This policy could promote sustainable design practices as part of new designations or the redevelopment of industrial sites.

### 2.4.3.8 Locally Significant Industrial Sites

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	0	The protection of industrial land would limit land available for other uses, including housing. However, where mixed-intensification is more suitable, there is the opportunity for housing uplift and improvements to the overall community amenity.	
<b>Economy</b>	+	This policy would provide economic opportunities and where mixed-intensification is suitable would encourage a greater range of employment opportunities and likely support smaller businesses and industrial uses. Conforming uses with high employment and economic value will be prioritised.	The policy could include reference to the provision of support to minority, small, local and/or green businesses, and social enterprises.
<b>Education and skills</b>	0	Whilst some uses may provide training and learning opportunities for people, the policy would not directly affect educational provision in the borough.	
<b>Health</b>	+	The protection of industrial land is unlikely to make a significant contribution towards this objective, but as good employment is a key health determinant, the policy would have some mental and physical health benefits in Ealing. Additionally, where mixed-intensification is suitable, additional services and opportunities may further support other health determinants.	
<b>Connectivity</b>	0	This policy commits to ensuring any mixed intensification would deliver necessary supporting infrastructure, which could include transport.	This policy could directly refer to delivering well-connected uses, particularly where mixed-intensification is proposed.
<b>Air quality and noise</b>	0	Mixed-intensification may result in adverse impacts on new development where uses are not appropriate, for example placing noise-generating businesses near noise-sensitive receptors. The policy does however commit to high quality built environments and placemaking, and alongside good master planning design, this potential impact should be avoided.	As part of the delivery of a high quality built environment, the policy could refer to consideration of the local context and ensuring the mix of uses is appropriate.
<b>Resources and land use</b>	+	The policy strongly supports the protection and intensification of industrial land, which would positively contribute to both the local and London economy. It also notes the potential for mixed-intensification, further supporting the efficient use of land in Ealing.	

Objective	Score	Assessment	Mitigation / Recommendations
<b>Historic environment, culture and townscape</b>	<b>0</b>	Primary consideration to industrial needs is unlikely to contribute towards this objective. However, it is anticipated that the significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards.	
<b>Biodiversity and Green Infrastructure</b>	<b>0</b>	As sites would be designated for industrial or mixed-intensification uses, this policy would not support much biodiversity or green infrastructure. Owing to the provision of appropriate planning requirements and design standards, it is anticipated that any biodiversity present or in proximity to a site would be protected.	
<b>Water environment</b>	<b>0</b>	The intensification or redevelopment of existing sites does not allow for areas at high risk of flooding to be avoided. However, it may offer the chance to enhance groundwater quality on brownfield sites through remediation of contamination sources. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	
<b>Climate change mitigation</b>	<b>0</b>	Development of an industrial site is likely to result in carbon emissions. However, industrial development may facilitate investments in green technologies, equipment and infrastructure that reduce GHG emissions.  Integrating land uses may reduce the number of vehicle movements which in turn could reduce the associated emissions.	
<b>Climate change adaptation</b>	<b>0</b>	Considered development of LSIS and existing planning requirements and design standards could ensure the land and buildings are able to withstand the potential future impacts of climate change and risks such as flooding are managed sufficiently at the development stage.	This policy could promote sustainable design practices as part of new designations or the redevelopment of LSIS.

### 2.4.3.9 Town Centres

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy would directly support mixed-use centres which enhance community services and amenity, supporting the development of diverse and sustainable communities.	
<b>Economy</b>	+	The policy would improve access to Ealing's commercial and employment cores. The provision of mixed use commercial units would generate revenue and deliver a variety of employment land types. The policy would also provide employment opportunities for local residents.	It could be beneficial for the policy to also support more diverse, small, start-up, local and green businesses.
<b>Education and skills</b>	0	Whilst some uses may provide training and learning opportunities for people, the policy would not directly affect educational provision in the borough.	
<b>Health</b>	+	The policy would support several health determinants associated with the built environment and socio-economic factors, such as increased employment opportunities and access to recreational and social activities and open space. The policy also directly supports active travel within town centres, encouraging healthier lifestyles. The development of resilient centres with respect to a changing climate would also allow for adaptation and reaction to potential future major health issues caused by episodes of extreme weather.	
<b>Connectivity</b>	+	The policy commits to ensuring that most people can access what they need within twenty minutes from their homes in an active way, which would result in direct positive improvements in connectivity across the borough.	The policy could include reference to ensuring that active travel is safe and affordable.
<b>Air quality and noise</b>	+	The policy would encourage forms of active travel, such as walking and cycling, which would reduce reliance on private vehicle usage, and associated noise and emissions.	It could be beneficial to promote new buildings and businesses in town centres which adopt energy efficient measures and construction techniques which minimise emissions. Design should also promote high quality living conditions that are safe, energy efficient and well insulated for both energy and noise.
<b>Resources and land use</b>	+	The policy commits to ensuring that most people can access what they need within twenty minutes from their homes, which would promote	The policy could make direct reference to efficient land use practices of providing public and active travel in relevant

Objective	Score	Assessment	Mitigation / Recommendations
		efficient land use practices across the borough and the provision of mixed-use developments to achieve this.	places to meet the twenty minute neighbourhood commitment.
<b>Historic environment, culture and townscape</b>	+	The policy would rejuvenate Ealing's town centres through the provision of mixed commercial uses, such as improved shopping amenities. It is anticipated that the significance of historic environment would be protected via relevant planning requirements and design standards.	The policy could promote new developments which respect the existing character of Ealing's town centres to safeguard valued townscapes and that Ealing's character is retained.
<b>Biodiversity and Green Infrastructure</b>	+	The policy would improve and increase opportunities for people to access green and natural spaces through networks of greenspaces and commitments to urban greening.	The policy could include reference to the protection of new and improved green spaces to mitigate any negative impacts from increased use.
<b>Water environment</b>	0	The policy is unlikely to contribute to flood risk and water environment objectives in the borough. However, it may offer the chance to enhance groundwater quality on brownfield sites through remediation of contamination sources. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	The policy could include measures to encourage the use of flood resilient design measures for new developments, including SUDS. This would be particularly relevant to town centres in the river corridor areas of the borough.
<b>Climate change mitigation</b>	+	The policy would facilitate active travel uptake across the borough, which would reduce reliance on private vehicle usage and associated emissions.	
<b>Climate change adaptation</b>	+	The policy would directly improve the borough's resilience to climate change through the provision of mixed centres by offering resilience through shared public infrastructure and urban greening.	Further resilience could be achieved by requiring the application of sustainable design standards.

### 2.4.3.10 Open space

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The protection of open spaces would provide attractive areas for recreation, exercise and relaxation, enhancing community amenity.	
<b>Economy</b>	0	Open spaces are unlikely to substantially contribute to economic objectives in the borough. However, depending on their type, they may support certain businesses such as cafes, and generally provide more attractive, natural areas in the borough, creating a more desirable place to live and work.	...The policy could seek to approach open space and green infrastructure so that the space achieves multiple benefits beyond its basic functionality.
<b>Education and skills</b>	0	The protection of open spaces is unlikely to contribute directly to education and skills, however measures could be encouraged which support educational and learning opportunities, such as field studies and trips, outdoor play or nature-based learning.	As part of the associated recreation referred to in the policy, educational and learning opportunities could be considered.
<b>Health</b>	+	The policy is likely to create an environment that promotes healthy and active lifestyles through the protection and/or enhancement of open areas, providing space for activities such as exercise, recreation or relaxation.	Other enhancement measures could be included beyond greening, particularly where open spaces serve an amenity purposes. For example, measures around good traffic management, connectivity and accessibility, or providing/protecting interactive and playful spaces.
<b>Connectivity</b>	+	The policy would contribute to encouraging active forms of transport by providing spaces for walking and cycling.	The policy could make reference to accessible and well-connected open spaces to encourage their use, for example connecting to public rights of way or national cycle networks.
<b>Air quality and noise</b>	+	The protection and enhancement of larger open spaces would provide areas within the urban environment further from sources of noise or poor air quality, such as industry or roads. It would also provide quiet spaces for people, supporting wider health benefits. However, the size of open spaces varies geographically and by type, and therefore in some smaller areas, sources of loud noise or emissions are likely to be closer.	

Objective	Score	Assessment	Mitigation / Recommendations
<b>Resources and land use</b>	0	The policy seeks to protect open spaces from development, which may facilitate the efficient use of land elsewhere in the borough in more appropriate areas.	The policy could go further and prohibit all development within open spaces, facilitating the protection of natural and recreational spaces and encouraging more efficient land use planning.
<b>Historic environment, culture and townscape</b>	+	The policy would facilitate the protection of open spaces and their views, preserving the existing townscapes of Ealing. Open spaces within the urban environment typically provide more natural, attractive areas, helping to enhance the local townscape and create a more desirable area for residents, businesses and visitors.	
<b>Biodiversity and Green Infrastructure</b>	+	The policy would protect and enhance green infrastructure across Ealing, benefiting local biodiversity, alongside facilitating opportunities for people to access nature and green spaces.	The policy could go further and prohibit all development within open spaces, facilitating the protection of natural and recreational spaces and encouraging and enhancing open space, which is in a poor state, location or not fit for purpose.
<b>Water environment</b>	+	The policy commits to the protection of open and green spaces, including the blue ribbon network. This would help to protect and improve Ealing's key rivers and waterways, and potentially reduce exacerbating flood risk in these areas by minimising new development.	
<b>Climate change mitigation</b>	0	Through restricting development to protect open spaces, the policy may encourage more efficient use of land and repurposing of buildings elsewhere in the borough. Protecting the existing open spaces supports the carbon sequestration function of the network. Measures to encourage greater connectivity to sustainable forms of transport should be encouraged.	<p>The policy could make reference to accessible and well-connected open spaces to encourage their use, for example connecting to public rights of way or national cycle networks.</p> <p>The policy could promote open spaces which are able to withstand future climate change pressures, such as the provision of drought-resistant plant species and areas which provide shade.</p>
<b>Climate change adaptation</b>	+	The policy commits to the protection of open and green spaces, including the blue ribbon network. This would potentially reduce exacerbating flood risk in these areas by minimising new development. Large areas of open spaces can also provide cooler areas of shade and alleviate urban heat island effects.	

### 2.4.3.11 Urban Greening Factor

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	Urban greening of residential properties would likely create a more pleasant environment to live. It would also deliver more sustainable communities owing to the wide range of positive environmental effects that urban greening has, such as improving flood resilience and providing opportunities to enhance biodiversity.	The policy could include reference to ensuring that green infrastructure implemented within residential developments can be accessed and/or utilised by its residents where appropriate. For example, it could favour the implementation of green roofs where residents can spend time.
<b>Economy</b>	0	The Urban Greening Factor standard would not directly impact the economy. However, the policy could provide employment opportunities regarding the design and/or construction of greening features, such as green roofs as well as ongoing maintenance	
<b>Education and skills</b>	0	The Urban Greening Factor standard would not directly affect education and skills. However, it could provide opportunities for residents to understand more about the importance of biodiversity and sustainable design.	
<b>Health</b>	+	Urban greening has been proven to improve both mental and physical health. For example, it would boost morale and wellbeing amongst residents via the creation of high quality environments.	The policy could make reference to adopting the Urban Greening Factor among active travel routes. This may encourage active travel and reduce private vehicle use with resulting improvements in the physical health of users.
<b>Connectivity</b>	0	The Urban Greening Factor standard would not directly affect connectivity. However, it could improve user experience by increasing the quality of the surrounding environment.	The policy could make reference to adopting the Urban Greening Factor among active travel routes. This would improve user experience, thus encouraging residents to adopt these routes, rather than using private vehicles.
<b>Air quality and noise</b>	+	Urban greening, if implemented appropriately, may improve local air quality and reduce public exposure to air pollution. Urban greening would also create the perception of quieter and cleaner spaces within Ealing.	
<b>Resources and land use</b>	+	Urban greening would enhance water retention, thus increasing the efficient use of this particular resource.	The policy could include specific reference to favouring urban greening practices that work to harvest rainwater, such as green roofs. The policy could also encourage



			urban greening into the design and redevelopment of brownfield sites.
<b>Historic environment, culture and townscape</b>	+	The Urban Greening Factor standard would not significantly impact Ealing's historic environment, cultural setting. However, urban greening would improve the overall quality of townscape.	
<b>Biodiversity and Green Infrastructure</b>	+	Urban greening would directly improve biodiversity by providing an increase in habitats for wildlife.	<p>The policy could include reference to ensuring that green infrastructure can be accessed and maintained where appropriate.</p> <p>The policy could also support planting plans that promote a diverse range of plant species with high ecological value.</p>
<b>Water environment</b>	+	Urban greening would attenuate and filter rainwater, thus reducing flood risk, supporting the efficient use of water and improving water quality.	The policy could include specific reference to favouring urban greening practices that work to harvest rainwater, such as green roofs.
<b>Climate change mitigation</b>	+	Urban greening would contribute to the mitigation of climate change by increasing opportunities for biological carbon sequestration. This would help Ealing reduce the built environment's contribution to CO <sub>2</sub> emissions.	<p>The policy could include specific reference to favouring urban greening practices that have high carbon sequestration potential, such as tree planting.</p> <p>The policy could also make reference to adopting the Urban Greening Factor among active travel routes. This would improve user experience, thus encouraging residents to adopt these routes, rather than using private vehicles.</p>
<b>Climate change adaptation</b>	+	The policy would promote design which can reduce the impacts of climate change and extreme weather events, namely flooding and overheating.	The policy could include specific reference to favouring urban greening practices that work to harvest rainwater, such as green roofs. This would work to optimise flood risk reduction.

### 2.4.3.12 Carbon Offsetting

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	Drawing upon appropriate BREEAM or Passivhaus standards for residential development would help to improve the quality of Ealing's housing stock and deliver sustainable communities.	
<b>Economy</b>	+	Measures implemented across residential developments to reduce carbon emissions would also help to enhance energy efficiency, resulting in cost savings and some economic benefit.	<p>The policy could make reference to the provision of affordable energy for local residents.</p> <p>The policy could also make reference and complement to the London Sustainable Development Commission (LSDC) Green and Fair Recovery agenda and Ealing's Greenprint for Economic Recovery and Renewal 2021.</p>
<b>Education and skills</b>	N/A	The policy is not considered relevant to this objective.	
<b>Health</b>	+	Reducing carbon emissions could reduce the health effects associated with climate change-induced extreme weather events, such as heat-related illnesses.	
<b>Connectivity</b>	N/A	The policy is not considered relevant to this objective.	
<b>Air quality and noise</b>	+	The creation of more sustainable and low energy development would help to reduce emissions and associated air quality impacts.	
<b>Resources and land use</b>	+	The policy would contribute towards the efficient use of land by supporting the retrofitting of existing homes and the provision of a more sustainable building stock in Ealing. Standards such as BREEAM also include measures which encourage resilient design and resource efficiency.	
<b>Historic environment, culture and townscape</b>	+	This policy is unlikely to contribute towards this objective. However, it is anticipated that the significance of historic environment assets and their setting would be protected via relevant planning requirements and design standards, particularly in relation to retrofitting.	

Objective	Score	Assessment	Mitigation / Recommendations
<b>Biodiversity and Green Infrastructure</b>	+	The policy may indirectly support the protection of public open space and nature sites by encouraging sustainable development. Standards such as BREEAM include measures which seek to benefit local biodiversity and avoid loss.	
<b>Water environment</b>	+	Standards such as BREEAM include measures which encourage sustainable development which seek to reduce water consumption and support water efficiency.	
<b>Climate change mitigation</b>	+	Reducing the borough's carbon footprint would have a direct impact on climate change mitigation. This would help Ealing meet local and London-wide emissions targets and reduce the built environment's contribution to carbon dioxide emissions.	
<b>Climate change adaptation</b>	+	Standards such as BREEAM and Passivhaus include measures which encourage resilient design that can withstand the impacts of future climate change.	The policy could include reference to encouraging green innovation in both new developments and retrofits.

### 2.4.3.13 Funding the Plan

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	+	The policy would follow the approach set out in the London Plan and will therefore aim to meet housing targets.	
<b>Economy</b>	+	The policy would likely improve access to employment opportunities through improvements to physical, social and green infrastructure.	
<b>Education and skills</b>	+	The policy can be expected to improve educational provision in the borough through the Community Infrastructure Levy.	
<b>Health</b>	+	The policy would support several health determinants by promoting improvements to physical, social and green infrastructure which could lead to improvements in physical and mental health.	
<b>Connectivity</b>	+	The policy would promote improvements to physical, social and green infrastructure which could lead to better connectivity across the borough.	
<b>Air quality and noise</b>	+	The policy would promote improvements to green infrastructure which could lead to improved air quality across the borough. A focus on and investment in public transport would help reduce noise and air pollution.	
<b>Resources and land use</b>	+	The policy would follow the approach set out in the London Plan and is therefore likely to encourage integrated, efficient land use.	
<b>Historic environment, culture and townscape</b>	+	The policy would follow the approach set out in the London Plan and is therefore likely to respect Ealing's historic environment asset and local character.	
<b>Biodiversity and Green Infrastructure</b>	+	The policy would promote improvements to green infrastructure which could lead to local biodiversity improvements.	
<b>Water environment</b>	+	If contributions from multiple developments are combined, this could create opportunities to implement larger scale measures to combat	

Objective	Score	Assessment	Mitigation / Recommendations
		flood risk and promote sustainable urban drainage than would be possible on a project by project basis.	
<b>Climate change mitigation</b>	+	The policy would promote improvements to physical, social and green infrastructure which could facilitate active travel uptake across the borough, reducing reliance on private vehicle usage and associated emissions.	
<b>Climate change adaptation</b>	+	The policy would directly improve the borough's resilience to climate change through improvements to green infrastructure.	

#### 2.4.3.14 Enabling development

Objective	Score	Assessment	Mitigation / Recommendations
<b>Housing and communities</b>	?	Housing targets alone are not considered enabling development and therefore this policy is unlikely to substantially contribute to housing need. The policy does however allow for the delivery of development which would outweigh any harm, which may facilitate the delivery of housing. Nevertheless, housing sites could be put at risk if they were subject to the application of enabling development.	The policy could include measures to protect certain services, facilities or land uses such as housing.
<b>Economy</b>	?	The policy allows for the delivery of development which would outweigh any harm, which may facilitate the delivery of key economic and growth opportunities in the borough. However, it could put other employment uses or services at risk, including small, affordable or minority-owned businesses, if they were subject to the application of enabling development.	The policy could include measures to protect certain services, facilities or land uses such as more vulnerable employment uses such as small or minority-owned businesses, or affordable workspace.
<b>Education and skills</b>	?	The policy allows for the delivery of development which would outweigh any harm, which may facilitate the delivery of educational services or facilities in the borough. However, it could put institutions or services at risk if they were subject to the application of enabling development.	The policy could include measures to protect certain services, facilities or land uses such as educational institutes.
<b>Health</b>	?	The policy allows for the delivery of development which would outweigh any harm, which may facilitate the delivery of health services or facilities in the borough. However, it could put services at risk if they were subject to the application of enabling development.	The policy could include measures to protect certain services, facilities or land uses such as healthcare facilities.
<b>Connectivity</b>	0	The policy would not directly contribute to this objective, however placing any new development should be in appropriate, well-connected locations which are accessible via sustainable forms of transport should be supported, which would contribute to minimising further harm.	The policy could make reference to promoting new developments which are well-connected.
<b>Air quality and noise</b>	0	The policy would not directly contribute to this objective, however new development should be located in appropriate and well-connected areas and alongside complementary uses to avoid negative impacts on the local environment.	The policy could make reference to ensuring the local environment and context are considered as part of enabling development considerations to minimise impacts on the local environment associated with noise or poor air quality.

Objective	Score	Assessment	Mitigation / Recommendations
<b>Resources and land use</b>	0	The policy would not directly contribute to this objective, however where enabling developments are applied, efficient land use practices, such as the reuse of existing infrastructure or providing a mix of uses, should be promoted.	Efficient land use practices, such as the reuse of existing infrastructure or providing a mix of uses, should be promoted.
<b>Historic environment, culture and townscape</b>	0	The policy derives from a heritage led approach aimed at addressing a conservation deficit which would therefore support this objective. However, the policy also allows for the delivery of development which would outweigh any harm. This may result in adverse impacts on designated assets.	The policy could add detail regarding how the protection of heritage assets and conservation areas will remain a priority.
<b>Biodiversity and Green Infrastructure</b>	-	The policy allows for the delivery of development which would outweigh any harm, which may result in adverse impacts on designated sites.	
<b>Water environment</b>	0	The policy would not directly contribute to this objective; however it may offer the chance to enhance groundwater quality on brownfield sites through remediation of contamination sources. It is assumed that existing planning requirements and design standards would ensure flood risk and water resources are managed sufficiently at the development stage.	
<b>Climate change mitigation</b>	0	Any development is likely to result in carbon emissions. The design measures and impacts referenced in the policy are unlikely to have an impact on overall emissions within the borough.	
<b>Climate change adaptation</b>	0	The policy would not directly contribute to this objective, however where enabling developments are applied, new infrastructure should be built to be resilient from the impacts of climate change.	

#### 2.4.4 Policy modifications based on IIA

Throughout the IIA process the proposed policies have undergone several iterations. IIA recommendations that have been incorporated included minor wording changes to ensure consistency across the policies, particularly town policies, other recommendations increased the policy scoring, these were:

- references to affordability against the 'Housing and Communities' and 'Economy' objectives,
  - including affordable workspace across the towns and industrial sites
- references to supporting minority businesses,
- supporting access to open/green spaces,
- references to the safety of users on active travel routes.

#### 2.4.5 Cumulative assessment

In addition to assessing the effects of policies on an individual basis, a review of the likely cumulative impacts of the policies has been undertaken. This assessment determines how some policies reinforce each other and their positive impacts and other policies can be conflicting which may result in negative impacts when assessed against the IIA framework objectives. The findings are presented in Table 7 below.

**Table 7: Cumulative impacts of the Local Plan policies**

Objective	Positive	Negative
<b>Housing and communities</b>	<p>The Local Plan manages the density of development in order to use land efficiently whilst not overpopulating the neighbourhoods and town centres.</p> <p>The Local Plan seeks to develop in areas where necessary supporting infrastructure is currently available or provide investment for supporting infrastructure. This will likely improve community services and amenity.</p>	There will need to be a balance between delivering the housing target and protecting open space across LB Ealing.
<b>Economy</b>	Range of economic opportunities provided would support different groups and business types.	There will be a need to protect smaller scale, less profitable businesses (such as creative & cultural industries).



Objective	Positive	Negative
	Improving links between LB Ealing and Central London, and regenerating the borough's town centres may encourage high-quality employers to (re)locate into the area.	
<b>Education and skills</b>	The proposed economic and employment opportunities would likely lead to an increase in training and qualification for local residents.	Depending on the exact location of new developments in relation to education facilities, there could be a risk of increasing pressure on the capacity of local schools and colleges.
<b>Health</b>	<p>The Local Plan supports many of the wider determinants of health, including increased employment and active travel options which will likely have a positive impact on both the mental and physical health of residents.</p> <p>The Local Plan would also see the delivery of more direct health interventions such as health and social infrastructure.</p>	Depending on the location of housing developments in relation to healthcare facilities, there could be a risk of increasing or exceeding capacity and placing these facilities under pressure.
<b>Connectivity</b>	Maximising existing infrastructure and investing in green infrastructure could make travel plans more sustainable. It is also likely that increased rates of active travel would contribute to improving health, both physical and mental, and wellbeing of residents.	Depending on the location of new developments and employment opportunities there could be a risk of increasing capacity pressures on existing infrastructure services.
<b>Air quality and noise</b>	Encouraging public and active travel routes through better connectivity could result in lower vehicle emissions leading to better local air quality.	<p>Mechanical ventilation as a solution may conflict with other objectives like climate mitigation.</p> <p>The construction and operation associated with the increase in employment/industrial and residential developments could lead to an increase in the borough's consumption of energy and associated GHG emissions, negatively impacting air quality.</p>
<b>Resources and land use</b>	The Local Plan will encourage development on previously developed land or brownfield sites which could unlock	Any new development on previously undeveloped land or greenfield sites has the potential to negatively impact air quality, noise, traffic congestion and biodiversity. New

Objective	Positive	Negative
	economic opportunities and offer the chance for remediation and improving groundwater quality.	developments could also become a potential new target for criminal activity.
<b>Historic environment, culture and townscape</b>	Overall, it is expected that the Local Plan would support developments that are sensitive to local character and setting.	New developments could result in the loss of local character or damage to existing heritage assets and their setting, especially if the development is on or near to green open spaces.
<b>Biodiversity and Green Infrastructure</b>	<p>Biodiversity net gain will be a requirement for planning applications. This will likely have a positive impact on local biodiversity, above the baseline, and could improve local amenity and mental health.</p> <p>Protecting and, where possible, enhancing green spaces could improve local air quality which in turn could support a key health determinant and reduce GHG emissions.</p>	<p>Increasing connectivity and encouraging the use of green space will likely bring several benefits but could result in added pressure on nature.</p> <p>Development vs protection of sites</p> <p>Encouraging use of open space may unintentionally lead to crime and anti-social behaviour, leading to an increased risk for vulnerable groups.</p>
<b>Water environment</b>	The Local Plan recognises the importance of protecting blue infrastructure which will help maintain or improve the current water quality status of these waterbodies.	<p>An increase in residential and economic growth would likely lead to an increase in the total water consumption of the borough.</p> <p>Development on greenfield sites or previously undeveloped land could lead to an increase in impermeable land and therefore increases the risk of surface water flooding.</p> <p>Where development is close to rivers and/or waterbodies, the construction phase could pose a pollution and contamination risk if construction management best practise is not adhered to.</p>
<b>Climate change mitigation</b>	The protection, enhancement, and delivery of green infrastructure for public amenity and social infrastructure could also increase the carbon sink capacity of the borough.	Numerous infrastructure policies which on their own would not pose a significant climate change risk (e.g., social infrastructure, culture industry infrastructure, meanwhile use), could collectively have a significant impact.

Objective	Positive	Negative
		<p>The construction and operation associated with the increase in employment/industrial and residential developments could lead to an increase in the borough's consumption of energy and associated GHG emissions.</p> <p>Although growth within Ealing may provide the opportunity to better facilitate climate change mitigation, the increased consumption of resources, as part of such development, may counteract the beneficial impacts.</p>
<b>Climate change adaptation</b>	Protecting and enhancing green and blue spaces could potentially reduce exacerbating flood risk and provide cooler areas of shade.	Numerous infrastructure policies which on their own would not pose a significant climate change risk but collectively increase developed areas across the borough which results in less permeable surface and potential heat island effects.

## 2.5 IIA Sites assessment

### 2.5.1 Methodology

The IIA sites appraisal comprises of a review of the short-list of site allocations. The short-list has been determined by the Arup Sites Team in consultation with the Ealing Local Plan Team based on size, availability and existing development.

The sites assessment uses the IIA framework objectives and, where applicable, the guiding questions which were agreed at the IIA Scoping Stage. To inform the assessment and provide justification for the scoring against each objective, a range of criteria has been developed in conjunction with the Sites Team, as shown in Table 8.

Publicly available information, including spatial data and aerial imagery, was used when the scoring criteria was objective, such as distances or land classification (i.e., contaminated land and flood zones). In some cases, where data was not available or the criteria was subjective, professional judgement was used (i.e., changes in employment capacity and potential enhancement to heritage asset and settings). Where required, a rationale for the scoring and any recommended mitigation / considerations were provided as part of the appraisal.

The scoring system set out in Table 2 used for the policy assessments was also used for the sites assessment. The findings of the Sites Assessment are shown in Appendix D.

**Table 8: The IIA framework guiding questions and criteria used to determine the Sites appraisal scoring.**

IIA Objective	ID	Relevant guiding questions	Sites appraisal criteria				
			+	0	-	N/A	?
<b>1. Housing and communities</b>	1	Address housing need in the borough?	Site would deliver new homes	Site would not deliver new homes	Site would result in a net loss of homes	Not applicable	Not enough information
<b>2.Economy</b>	2	Secures existing or new employment capacity?	Site would deliver new employment capacity	Site would result in no change to employment capacity	Site would result in a net loss of employment capacity		
<b>3.Education and skills</b>	3	Improve access to a diverse range of educational opportunities?	Site includes provision for a school / or is less than 1km from an existing primary school	Site is within 1-4km of an existing primary school	Site is over 4km from an existing primary school.		
	4		Site includes provision for a school / or is less than 2km from an existing secondary school	Site is within 2-5km of an existing secondary school	Site is over 5km from an existing secondary school		
<b>4.Health</b>	5	Make provision for new, improved or replacement healthcare facilities?	Site includes healthcare provision, or is within 1km of an existing GP surgery	Site is within 1-4km of an existing GP surgery	Site is over 4km from an existing GP surgery		

	6		Site incorporates Public Open Space addressing deficiency		Site is within an area deficient in access to local or district open spaces, or would result in a loss of public open space		
	7a		Site is less than 1.5km from a health facility	Site is between 1.5 and 2.5km of a health facility	Site is over 2.5km from a health facility / could result in the loss of facilities		
	7b		Site is less than 1.5km from a leisure facility	Site is between 1.5 and 2.5km of a leisure facility	Site is over 2.5km from a leisure facility / could result in the loss of facilities		
<b>5. Connectivity</b>	8	Ensure active travel opportunities and public transport networks are available?	Site PTAL is between 4 and 6b	Site PTAL is between 2 and 3	Site PTAL is between 0 and 1b		
	9	Increase safe opportunities for active forms of transport?	Site is within 1km of active travel routes (Public Rights of Way or National Cycle Networks)	Site is between 1km and 2km of active travel routes	Site is located over 2km from active travel routes		
<b>6. Air quality and noise</b>	10	Ensure good spatial planning which avoids exposing people to poor air quality and high noise levels?	The site is not located within an area which falls within the following limits: - PM10 30µg/m³ - NO2 30µg/m³	Part of the site is located within an area which falls within the following limits, and sensitive design would be required: - PM10 30µg/m³ - NO2 30µg/m³	The site is located within an area which falls within the following limits, and mitigation would be required: - PM10 30µg/m³ - NO2 30µg/m³		
	11	Ensure good spatial planning which avoids exposing people to poor air quality and high noise levels?	Average noise levels of the site are less than 55db		Average noise levels of the site are 55db or over		
<b>7. Resources and land use</b>	12	Use land efficiently through the development of existing brownfield sites and / or the reuse of	Site is located on contaminated land / old landfill sites	Site is previously developed but has no known contamination issues	Site is on greenfield land		

		existing buildings? Ensure remediation of contaminated land at brownfield sites?					
<b>8.Heritage and Townscape</b>	13	Protect, conserve or enhance the significance of historic environment assets and their setting? Improve and increase opportunities for people to interact and access historic environment assets and learn about the history of the borough?	Site could enhance the significance of the heritage asset or designation, or its setting (including Conservation Areas, Listed Buildings, Scheduled Monuments or local designations); or  Site offers the potential to remove an asset from the Heritage at Risk Register	Site is considered to have a neutral impact on heritage assets due to being over 500m from an asset or designation.	Site is located within a Conservation Area/ its setting or contains/ is within the setting of a heritage asset and it's unlikely effects can be mitigated; or  Proposals would likely result in the loss of a heritage asset.		
<b>9.Biodiversity and Green Infrastructure</b>	14	Protect and enhance green and blue infrastructure? Improve and increase opportunities for people to access green and natural spaces? Develop connectivity between the network of open and green spaces across the borough?	Site has the potential for habitat connectivity at the landscape scale through its proximity to open spaces	Site offers little potential for connectivity to existing open spaces	Site could result in the severance / loss of existing open spaces		
	15	Protect and enhance green and blue infrastructure? Improve and increase opportunities for people to access green and natural spaces?	Development offers potential to introduce biodiversity on a site that currently has no / very little ecological value	Baseline site is of low ecological value	Site would result in the loss of areas of high ecological value		

	16	Protect and enhance green and blue infrastructure?	The site is not located within a designated site and provides an opportunity to enhance the existing network.		The site is located on a designated site and may involve the loss of open space with no opportunities for offsetting.		
<b>10. Water resources</b>	17	Avoid development in areas at high risk of flooding?		Site is within Flood Zone 1	Site is within Flood Zone 2 or 3		
	18	Avoid development in areas at high risk of flooding?	Site offers potential to significantly reduce flood risk (fluvial and surface) (e.g. an existing area of large hard standing)	Site would have no / limited impact on reducing flood risk	Site has the potential to result in increased flood risk (e.g. a current greenfield site)		
	19	Protect groundwater and enhance groundwater quality?	Site is within an area of low groundwater vulnerability	Site is within an area of medium groundwater vulnerability	Site is within an area of high groundwater vulnerability		
<b>11. Climate change mitigation</b>	See Objective 5. Connectivity for relevant criteria						
<b>12. Climate change adaptation</b>	See Objective 10. Water resources for relevant criteria						

## 3. Equalities Impact Assessment

### 3.1 Introduction

This section summarises the EqlA, which is presented as a discrete assessment.

The Equality Act 2010 imposes a duty on public bodies that shape policy, deliver service and/or employ people. The duty requires public bodies to:

- have due regard to the need to eliminate discrimination;
- advance equality of opportunity; and,
- foster good relations between different people when carrying out their activities.

EqlA is a means of systematically identifying and assessing the likely effects arising from the design and implementation of a proposed plan, policy, or project for people sharing one or more protected characteristics. EqlA itself is not a legal requirement<sup>11</sup> and formal guidance on the approach is not available. However, it is a recognised method commonly employed to demonstrate compliance with the Equality Act.

### 3.2 Methodology

The EqlA identifies the likely effects on discriminatory practices, the potential to alter the opportunities of certain groups of people and/or effects on relationships between different groups of people which could arise as a result of the proposals.

In order to understand which groups of people (or individuals) may suffer discrimination the Equality Act sets out a series of “protected characteristics”:

1. age
2. disability
3. gender reassignment
4. marriage and civil partnership
5. pregnancy and maternity
6. race
7. religion or belief
8. sex
9. sexual orientation

The assessment identifies whether people with protected characteristics would be disproportionately or differentially affected by the proposals. This can be defined as:

- Disproportionate: there may be a disproportionate equality effect where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population.
- Differential: there may be a differential equality effect where people with a protected characteristic are affected differently from the general population as a result of vulnerabilities or restrictions they face because of that protected characteristic.

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<sup>11</sup> House of Commons 2020. The Public Sector Equality Duty and Equality Impact Assessments. Available online at: <https://researchbriefings.files.parliament.uk/documents/SN06591/SN06591.pdf>



The equality duty only applies to the protected characteristic of marriage and civil partnership in relation to employment discrimination. It is therefore considered unlikely that there would be effects from the Local Plan proposals for people on the basis of marriage and civil partnership. As such, this characteristic was scoped out of the assessment at the Scoping Stage.

Whilst socio-economic status is not a characteristic protected by the Equality Act, it is best practice to consider this topic in an EqlA due to its close association with the protected characteristics. Socio-economic groups to be considered in the EqlA include those on low incomes, carers and those living in deprived areas.

### **3.3 EqlA Assessment**

In the following sections, the preferred Option is assessed, see section 3.3.1. This is followed by the Strategic policies in section 3.3.2, the Town policies in 3.3.2 and the Development Management policies in section 3.3.3.

### 3.3.1 Preferred option EqlA

Positive Effects	Negative Effects	Mitigation / Recommendations
<p>The Preferred Option focusses on reinforcing the town's industrial core and diversifying local centres. This would create a resilient local economy and a variety of employment opportunities. This would benefit <b>younger and working-age people</b> as well as those of a <b>low socio-economic status</b>, which generally disproportionately includes <b>those with disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The Preferred Option would benefit <b>all protected characteristic groups</b> by providing a range of mixed-use centres and enhancing connectivity between the various neighbourhood and town centres of LB Ealing. This will enable people to access more services, amenities and employment opportunities.</p> <p>The Preferred Option would improve access to healthcare, thus positively affecting individuals who are relatively prone to health problems and/or require frequent health care, such as <b>those with disabilities</b>, <b>the elderly</b>, and <b>pregnant people</b>.</p> <p>Policy would also protect and promote green infrastructure benefiting <b>all of the protected characteristic groups</b> with improvements to air quality particularly benefitting the <b>young, elderly</b>, those with underlying health conditions and those from <b>lower socio-economic groups</b> that are more vulnerable to health effects of poor air quality.</p>	<p>The Preferred Option would protect and promote the network of green and open spaces. Open spaces may unintentionally attract activities which lead to crime and anti-social behaviour and may lead to increased risk and vulnerability for certain groups including <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The Preferred Option would encourage a reduction in private vehicle usage across the town, which may negatively affect those who cannot access public transport, or other forms of transport, as easily. These groups include <b>individuals with certain disabilities or mobility issues, which may include the elderly</b>.</p> <p>No negative effects have been identified for <b>pregnant people</b>.</p>	<p>The Preferred Option seeks to improve open space networks and user experience. Therefore, the policy could include wording around ensuring safety measures are implemented in and around open spaces which aim to prevent crime and anti-social behaviour towards certain groups, namely <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The Preferred Option could also refer to making employment opportunities inclusive for all members of society, not just those with the most skills and the highest qualifications. This could, for example, include text that refers to entry level roles with training programmes and other upskilling opportunities.</p> <p>The Preferred Option could be amended to include wording on making sure that residential-development and regeneration is inclusive, and that it has good representation from <b>all protected characteristic groups</b>.</p>

### 3.3.2 Strategic policies EqIA

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
<b>SP1: A Vision for Ealing</b>	<p>Promoting 20-minute neighbourhoods would enable certain groups, such as people with <b>disabilities</b>, people going through <b>pregnancy</b> and <b>maternity</b> as well as <b>younger and older people</b>, to utilise services and amenities within an accessible distance.</p> <p>Promoting 20-minute neighbourhoods would encourage residents to walk and/or cycle. This would reduce reliance on private vehicle usage, and therefore improve air quality. This would benefit the <b>young</b>, the <b>elderly</b>, those with underlying health conditions and those in <b>lower socio-economic groups</b> who are more vulnerable to the health effects of poor air quality.</p> <p>The policy states that promoting 20-minute neighbourhoods would create a greener Ealing. Greening is considered to bring a number of positive benefits for <b>all protected characteristic groups</b>, mainly by delivering improvements to residents' quality of life.</p> <p>The policy would enhance the unique characteristics and cultural identities of Ealing's seven towns through the application of locally sensitive Good Growth principles. This would positively affect <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The policy would provide equitable access to jobs that provide decent living incomes. This would positively affect those of a <b>low socio-economic</b></p>	<p>Encouraging pedestrian trips and cycling could have negative impacts on <b>young</b>, <b>elderly</b>, and <b>disabled groups</b> who may be less able to make active travel journeys due to mobility issues and health and safety risks.</p> <p>Whilst focusing on tackling climate change has been identified to positively affect <b>all protected characteristic groups</b>, many climate change mitigation measures, such as transitioning to electric vehicles and implementing modern energy efficient technologies within homes, are expensive. Given this, people of a <b>low socio-economic status</b> may struggle with matching the progress made by others within the borough creating inequalities within communities.</p> <p>Diversifying and growing Ealing's business could encourage employment-led development that incorporates the provision of knowledge intensive, highly skilled jobs. This could disproportionately benefit individuals who are more qualified. This would be at the detriment of those who are less skilled, such as those of a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p>	<p>It could be beneficial to include wording on making pedestrian and cycling routes safe and accessible to all.</p> <p>It could also be beneficial to include wording on the inclusion of training programmes and qualification opportunities for the newly accessible jobs.</p> <p>It is recommended to split SP.1.D so fighting crime and fighting inequality are separate points. This is because fighting crime and fighting inequality are separate aims that will likely require a different policy response.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	<p><b>status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>. The diversification and growth of Ealing's business could result in the provision of more skilled jobs that include training and qualification opportunities for its employees. This would positively affect <b>working-age</b> individuals.</p> <p>Shaping the future of Ealing in a way that helps all children and young people get a fairer start in life will positively affect <b>younger people</b>.</p> <p>Taking firm action on climate change to protect the borough's future would positively affect <b>all protected characteristic groups</b> by decreasing the negative effects that climate change would otherwise create. It is considered that a reduction in these risks would particularly benefit people of a <b>low socio-economic status</b> because the economic pressures associated with damage would be reduced.</p> <p>A focus on fighting crime and inequality would positively affect <b>all protected characteristic groups</b>.</p>		
<b>SP2: Tackling the climate crisis</b>	<p>The implementation of 20-minute neighbourhood and strategic infrastructure that enhances connectivity would enable certain groups such as people with <b>disabilities</b>, people going through <b>pregnancy</b> and <b>maternity</b> as well as <b>younger and older people</b> to utilise services and amenities within an accessible distance.</p> <p>The reduction in carbon emissions and flood risk would bring a number of positive benefits for <b>all</b></p>	<p>The reduction of vehicle usage within the borough could negatively affect <b>people with disabilities</b> and the <b>elderly population</b> who are generally more reliant on private vehicles compared to public transportation.</p> <p>Many climate change mitigation measures, such as transitioning to electric vehicles and implementing modern energy efficient technologies within homes, are expensive. Given this, people of a <b>low socio-economic</b></p>	<p>The policy could include reference to making sure that public transport networks and active travel networks are safe and accessible for all.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	<p><b>protected characteristic groups</b> by decreasing the negative effects that climate change and flooding would otherwise create. It is considered that a reduction in these risks would particularly benefit people of a <b>low socio-economic status</b> because the economic pressures associated with damage would be reduced.</p> <p>It is also considered that measures to improve access to nature and protect biodiversity would benefit <b>all protected characteristic groups</b>, primarily by increasing residents' quality of life. The growing of local food would additionally benefit <b>all protected characteristic groups</b> by encouraging healthier lifestyles. This policy may particularly benefit those of a <b>low socio-economic status</b> as it could reduce the amount of money that people in this group need to spend on food.</p> <p>Measures to reduce the impacts of the aviation industry could benefit <b>individuals with disabilities</b>, particularly those with sensory issues, by alleviating impacts from noise and vibrations that would otherwise negatively affect them.</p>	<p><b>status</b> may struggle with matching the progress made by others within the borough creating inequalities within communities.</p>	
<b>SP3: Fighting Inequality</b>	<p>Designing safe, secure and accessible environments brings benefits to a number of groups who may not otherwise feel safe to use certain spaces including <b>women, the elderly, the disabled and the LGBTQ+ population</b>.</p> <p>Providing purpose built and designed Gypsy, Roma and Traveller site(s) to support safe travel through</p>	<p>No negative effects associated with this policy have been identified for any protected characteristic.</p>	<p>The policy states the council will work with NHS partners to identify opportunities for health infrastructure delivery. The policy could include reference to also working together with relevant stakeholder groups of local communities that are facing particular struggles in accessing healthcare such as <b>low socio-economic status groups, gender reassignment and sexual orientation groups (including women and</b></p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	<p>the borough will directly benefit this protected group.</p> <p>The delivery of education and community infrastructure through this policy could provide a number of opportunities to improve quality of life and could help address existing inequalities which would benefit all protected characteristic groups. In particular, this would benefit young people who access education on a daily basis and those in <b>lower socio-economic groups</b> who tend to live in the less favourable locations.</p> <p>Improving air quality could benefit the young, elderly, those with underlying health conditions and those in <b>lower socio-economic groups</b> who are more vulnerable to the health effects of poor air quality.</p> <p>The implementation of 20 minute neighbourhood would enable a number of people within certain groups such as people with <b>disabilities</b>, people going through <b>pregnancy</b> and <b>maternity</b> as well as <b>younger and older people</b> to access services and amenities within an easily walkable distance.</p> <p>The reintegration of land uses can encourage social cohesion and integration and can be particularly beneficial for certain groups such as <b>ethnic minorities</b> and <b>religious groups</b> as well as <b>the elderly</b>, who are more likely to suffer from social isolation.</p> <p>Green open space and indoor/outdoor sports infrastructure is considered to bring a number of</p>		<p><b>LGBTQ+), as well as maternity and pregnancy groups.</b></p> <p>The policy could include reference to ensuring that the supply of indoor and outdoor recreational facilities within the borough are accessible and inclusive for all regardless of protected characteristic or socio-economic status.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	positive benefits for <b>all protected characteristic groups</b> , but particularly in the physical development of <b>younger people</b> , rehabilitation of <b>older people</b> or those with <b>disabilities</b> , and groups going through <b>pregnancy</b> or <b>maternity</b> .		
<b>SP4: Creating Good Jobs and Growth</b>	<p>The policy would provide local employment opportunities, associated on-the-job training and potential job-related qualifications for <b>younger</b> and <b>working-age</b> people as well as those with a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>. Delivering affordable workspaces would also benefit these protected groups.</p> <p>The provision of affordable homes and higher-quality social rented properties will likely benefit those in <b>lower socio-economic groups</b> which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic and religious groups</b>. Working with residents to support local community-led housing initiatives enables those from protected characteristic groups to have a voice and ensure that new housing meets the specific needs of these groups.</p>	<p>The allocation of non-designated sites for industrial use could impact <b>all protected characteristic groups</b> if the land has the potential for residential development, open space or a place of worship.</p> <p>Supporting the night-time economy in town centres may lead to increased risk and vulnerability for certain groups, such as <b>women</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p>	<p>The policy could include reference to:</p> <ul style="list-style-type: none"> <li>supporting the allocation of non-designated sites which will not negatively impact on <b>protected characteristic groups</b>;</li> <li>the provision of specialist housing units for people with long-term <b>disabilities</b> and accessibility needs; and</li> <li>supporting activities and services which are well-connected and safe, especially for night-time uses.</li> </ul>

### 3.3.3 Town policies EqIA

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
<b>Acton Town Policy</b>	<p>The policy would benefit <b>all groups with protected characteristics</b> by providing a range of mixed uses across neighbourhood centres. The policy would also reinforce the north-south connectivity whilst improving the permeability of local neighbourhoods and supporting health and environment outcomes. This will enable people to access more services, amenities and employment opportunities.</p> <p>The policy would also deliver better accessibility to green infrastructure and social infrastructure such as green open spaces, children's play areas, and community uses which would also benefit <b>all of the protected characteristic groups</b>.</p> <p>The policy has a strong focus on providing diversified and resilient local economy through delivery of various employment spaces, including affordable and creative workspaces which can support small local businesses. This would benefit those of a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The policy also focuses on education, employment and skills opportunities that would support residents in the most deprived wards. This would benefit those from <b>lower socio-economic backgrounds</b>, particularly <b>younger people</b>.</p>	<p>The policy would add to the network of green and open spaces. Open spaces may unintentionally attract activities that could lead to crime and anti-social behaviour and may lead to increased risk and vulnerability for certain groups, the <b>elderly, women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b>, <b>people with disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>Supporting the night-time economy in town centres may also lead to increased risk and vulnerability for certain groups, such as the <b>elderly, women</b>, people who identify as <b>LGBTQ+</b>, <b>people with disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>No negative effects have been identified for <b>pregnant people</b> or those with a low <b>socio-economic status</b>.</p>	<p>Policy A.1 could be amended to include wording around ensuring safety measures are implemented in and around open spaces and town centres, particularly at night, which aim to prevent crime and anti-social behaviour towards certain groups, namely <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>Policy A.1 could also be amended to include wording around making open spaces and town centres high quality and inclusive spaces. This would benefit all groups, especially those with accessibility problems, such as <b>the elderly and people with certain disabilities</b>.</p> <p>The policy could be amended to include wording on making sure that residential-led growth and regeneration is inclusive, and that it has good representation from <b>all protected characteristic groups</b>.</p>



Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	<p>The provision of affordable housing units would directly benefit <b>younger</b> people and those of a <b>low socio-economic status</b>.</p> <p>The policy would improve access to healthcare, thus positively affecting individuals who generally require frequent health care, such as those with <b>disabilities</b>, the <b>elderly</b>, and <b>pregnant people</b>.</p> <p>The policy focuses on a residential-led approach to growth and regeneration, which would enable local residents from <b>all protected characteristic groups</b> to contribute towards growth and regeneration that meets their own specific needs.</p>		
<b>Ealing Town Policy</b>	<p>The policy would foster affordable housing and workplaces which would positively affect those of a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The policy would improve access to healthcare, thus positively affecting individuals who generally require frequent health care, such as those with <b>disabilities</b>, the <b>elderly</b>, and <b>pregnant people</b>.</p> <p>The policy would also improve Ealing town's cultural offer, which is considered to positively affect those belonging to <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The policy would enhance neighbourhood centres, community infrastructure and social infrastructure. It would also result in the delivery of a variety of uses, including retail space, commercial space, leisure facilities and offices. It is considered that this would benefit <b>all groups</b>.</p>	<p>The policy would reduce vehicle usage across the town, which may negatively affect those who cannot access public transport, or other forms of transport, as easily. These groups include <b>individuals with certain disabilities or mobility issues, which may include the elderly</b>.</p> <p>The policy would encourage employment-led development that incorporates the provision of knowledge intensive, highly skilled jobs. This could disproportionately benefit individuals who are more qualified. This would be at the detriment of those who are less skilled, such as those of a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>No negative effects have been identified for <b>pregnant people</b>.</p>	<p>The policy could be amended to reference enhancements to active travel routes making them safe and accessible to all.</p> <p>The policy could also refer to making employment-led development inclusive for all members of society, not just those with the most skills and the highest qualifications. This could, for example, include text that refers to entry level roles with training programmes and other upskilling opportunities.</p> <p>The policy notes that evening and night-time offers will be managed in a way that reduces antisocial behaviour. This aspect of the policy could be amended by also including specific wording on making evening and night-time offers "safe" for all protected characteristic groups, especially <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	The policy would enhance connectivity across the town through improvements in active travel, road infrastructure and cycle pathways. This would help <b>all groups</b> access everything they need more easily, particularly those in <b>lower socio-economic groups</b> who are less likely to have access to private vehicles.		
<b>Greenford Town Policy</b>	<p>The policy would benefit <b>all groups with protected characteristics</b> by providing a range of mixed uses across town centres and will strive to improve connectivity across Greenford and between the various neighbourhood and town centres of Greenford. This will enable people to access more services, amenities and employment opportunities, particularly beneficial for <b>lower socio-economic groups</b> who are less likely to have access to private vehicles.</p> <p>The policy would also deliver better accessibility to green and blue infrastructure and social infrastructure such as health, education and community uses which would also benefit <b>all of the protected characteristic groups</b>.</p> <p>The policy has a strong focus on providing diversified and resilient local economy through delivery of various employment spaces, including affordable spaces which can support small local businesses. This would benefit those of a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The policy would improve access to healthcare, thus positively affecting all groups but particularly individuals who are more likely to require frequent</p>	<p>The policy would add to the network of green spaces and improve accessibility to blue infrastructure such as the River Brent and Grand Union Canal. Open spaces can unintentionally lead to crime and anti-social behaviour and may lead to increased risk and vulnerability for certain groups including <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>No negative effects have been identified for <b>pregnant people</b>, those with <b>disabilities</b>, or those with a low <b>socio-economic status</b>.</p>	<p>Policy G1 could be amended to include wording around implementing safety measures in and around open spaces (in particular how safety will be provided around blue infrastructure such as Grand Union Canal) which aim to prevent crime and anti-social behaviour towards certain groups, namely <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The policy could also include wording to ensure that active travel routes are inclusive to all by including measure such as step-free access. This would be beneficial to groups such as <b>pregnant people</b> and those with certain <b>disabilities</b>.</p> <p>The wording of Policy G2 could be amended to include reference to making other groups who feel excluded from the night-time economy, not just families, feel safe.</p>

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	<p>health care, such as those with <b>disabilities</b>, the <b>elderly</b>, and <b>pregnant people</b>.</p> <p>Policy G.2 also looks to support the expansion of the night-time economy in a safe and inclusive manner therefore providing opportunities for people within certain groups (including those who identify as <b>LGBTB+</b>, <b>religious groups</b>, <b>women</b>, <b>ethnic minorities</b>, <b>younger people</b>) to experience Greenford town centres at night in a safe environment.</p>		
<b>Hanwell Town Policy</b>	<p>The policy would benefit <b>all groups with protected characteristics</b> by providing a range of mixed uses across town centres and will strive to improve connectivity across Hanwell particularly between the north and south of the town. This will enable people to access more services, amenities and employment opportunities.</p> <p>The policy would provide local employment opportunities and potentially associated on-the-job training and potential job-related qualifications for <b>younger</b> and <b>working-age</b> people as well as those with a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic and religious groups</b>.</p> <p>The provision of specialist housing units for the elderly population and first-time buyers directly benefit <b>older</b> and <b>younger</b> people, respectively.</p> <p>Policy would also deliver better accessibility to green and blue infrastructure and community uses which would also benefit <b>all of the protected characteristic groups</b>.</p>	<p>Policy H.1.G would invest in the network of green spaces. Open spaces may unintentionally attract activities that lead to crime and anti-social behaviour and may lead to increased risk and vulnerability for certain groups, <b>women</b>, <b>people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic and religious groups</b>.</p>	<p>Policy H.1.G could be amended to include wording around ensuring safety measure are implemented in and around open spaces, particularly at night, which aim to prevent crime and anti-social behaviour towards certain groups, namely <b>women</b>, <b>people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic and religious groups</b>.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
<b>Northolt Town Policy</b>	<p>The provision of alternative housing units for the elderly population and affordable housing directly benefit <b>older</b> and <b>younger</b> people, respectively. The regeneration of housing estates will have benefits for low socio-economic groups, which generally disproportionality includes those with disabilities and minority ethnic and religious groups.</p> <p>The policy would benefit <b>all groups with protected characteristics</b> by providing a range of mixed uses across town centres and would strive to improve connectivity across Northolt particularly between the north and south of the town. This increased provision of social infrastructure and access to services would be particularly beneficial to groups such as the <b>young, elderly</b> and <b>low socio-economic status</b> which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic groups</b> and <b>religious groups</b>.</p> <p>The policy would provide local employment opportunities and potentially associated on-the-job training and potential job-related qualifications for <b>younger</b> and <b>working-age</b> people as well as those with a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>Policy would also promote green infrastructure benefiting <b>all of the protected characteristic groups</b> with improvements to air quality particularly benefitting the <b>young, elderly</b>, those with underlying health conditions and those from <b>lower</b></p>	<p>Supporting the night-time economy in town centres may lead to increased risk and vulnerability for certain groups, such as <b>women</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p>	<p>The policy could be amended to include wording around ensuring safety measures implementation in and around open spaces/night-time uses which aim to prevent crime and anti-social behaviour towards certain groups, namely <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The policy could also include wording to ensure that active travel routes are inclusive to all by including measure such as step-free access. This would be beneficial to groups such as <b>pregnant people</b> and those with certain <b>disabilities</b>.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	<b>socio-economic groups</b> that are more vulnerable to health effects of poor air quality.		
<b>Perivale Town Policy</b>	<p>The policy would benefit <b>all groups with protected characteristics</b> by providing a range of mixed uses across neighbourhood centres. The policy would also reinforce the north-south connectivity whilst improving the permeability of local neighbourhoods and supporting health and environment outcomes. This will enable people to access more services, amenities and employment opportunities.</p> <p>The policy would also deliver better accessibility to green and blue infrastructure and community uses which would also benefit <b>all of the protected characteristic groups</b>.</p> <p>The policy has a strong focus on reinforcing the town's industrial core and diversifying local centres. This would create a resilient local economy and a variety of employment opportunities, including for small local businesses. This would benefit <b>younger and working-age</b> people as well as those of a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities and minority ethnic and religious groups</b>. The policy's increased provision of local, skilled jobs and access to vocational training would also benefit these groups, especially those with a <b>lower socio-economic status</b>.</p> <p>The policy aspires to provide a greater range of housing types and tenures, which would directly benefit <b>the elderly population, low income groups and young people</b>.</p>	<p>The policy would enhance the network of green, blue and open spaces. Open spaces may unintentionally attract activities that lead to crime and anti-social behaviour and may lead to increased risk and vulnerability for certain groups, <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic and religious groups</b>.</p> <p>The policy would reduce vehicle usage across the town, which may negatively affect those who cannot access public transport, or other forms of transport, as easily. These groups include <b>individuals with certain disabilities or mobility issues, which may include the elderly</b>.</p> <p>No negative effects have been identified for <b>pregnant people</b>.</p>	<p>Policy P.1F could be amended to include wording around ensuring safety measures are implemented in and around open spaces and town centres, particularly at night, which aim to prevent crime and anti-social behaviour towards certain groups, namely <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic and religious groups</b>.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
<b>Southall Town Policy</b>	<p>The policy would benefit <b>all protected characteristic groups</b> by providing a range of mixed-use centres and enhancing connectivity between the various neighbourhood and town centres of Southall. This will enable people to access more services, amenities and employment opportunities.</p> <p>Facilitating inter-generational living would benefit <b>elderly</b> grandparents by providing them with the opportunity to live comfortably with their younger relatives who can look after them. The policy also refers to meeting the specific housing needs of <b>older people</b>, as well as that for homeless people (who would be of a <b>low socio-economic status</b>), <b>people with disabilities and minority ethnic groups</b>.</p> <p>The policy supports an employment mix and affordable work space provision to meet a wide range of needs. It would foster business start-ups and an Inclusive Economy Plan which would respond to the specific conditions of poverty and deprivation. It would also provide support to entrepreneurs. Each of these initiatives would benefit those of a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities and minority ethnic and religious groups</b>.</p> <p>It is considered that the provision of affordable workspace would also benefit <b>younger people</b>, as would the policy's provision of links with schools, colleges and higher education in the area.</p> <p>The policy would improve access to healthcare, thus positively affecting individuals who are relatively prone to health problems and/or require</p>	<p>The policy would increase night time activity through the provision of increased night-time/24-hour services. This may lead to increased risk and vulnerability for certain groups, <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic and religious groups</b>.</p> <p>No negative effects have been identified for <b>pregnant people</b>, those with <b>disabilities</b>, or those with a low <b>socio-economic status</b>.</p>	<p>The policy can be amended to include wording around ensuring safety measures are implemented in and around open spaces/night-time uses which aim to prevent crime and anti-social behaviour towards certain groups, namely <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic and religious groups</b>.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	<p>frequent health care, such as those <b>with disabilities, the elderly, and pregnant people.</b></p> <p>The policy notes how public realm interventions would be required to combat perceptions of poor safety and vulnerability to crime. This would benefit <b>women, people with gender reassignment, people who identify as LGBTQ+ and minority ethnic and religious groups.</b></p> <p>The policy would see the involvement of the community in development plans, which would result in development that meets the needs of <b>all protected characteristic groups.</b></p>		

### 3.3.4 Development management policies EqlA

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
<b>Design and Amenity</b>	<p>Ensuring new development is responsible for avoiding adverse impacts through high quality design will positively affect <b>all protected characteristic groups</b>, but particularly those who are more susceptible to impacts from environmental conditions, including <b>older people</b> and <b>people with disabilities</b>, as well as those who are less able to exercise choice or influence over their environment, including groups with low socio-economic status.</p> <p>The protection of sensitive uses, in particular education and healthcare facilities and open spaces would directly benefit <b>younger</b> and <b>older people</b>, as well as groups going through <b>pregnancy and maternity</b>, and <b>people with disabilities</b>.</p>	<p>No negative effects associated with this policy have been identified for any protected characteristic.</p>	<p>The policy could be amended to:</p> <ul style="list-style-type: none"> <li>• include measures which support inclusive / diverse design;</li> <li>• include measures which meet accessibility needs and standards; and</li> <li>• consider other sensitive uses, such as places of worship and health and social facilities such as care homes, elderly homes or day centres.</li> </ul>
<b>Tall Buildings</b>	<p>Restricting tall buildings to specific sites may support the delivery at a borough-level of a range of housing types which could increase housing availability for more vulnerable groups, such as <b>older people</b> and <b>people with disabilities</b>. The designation of specific sites that are deemed more appropriate for tall buildings and can support their development may help to deliver affordable housing within the borough, benefitting groups with low <b>socio-economic status</b>.</p> <p>No specific positive effects associated with this policy have been identified for the <b>ethnic minority</b>, <b>religion</b>, <b>pregnancy and maternity</b>, <b>gender reassignment</b>, <b>sexual orientation</b> or <b>sex</b> protected characteristics.</p>	<p>The use of tall buildings to meet housing need, including for affordable housing, may result in the overprovision of smaller, apartment style accommodation with limited outside space, negatively impacting housing choice for <b>older people</b>, families containing <b>children</b>, <b>people with disabilities</b>, and groups with low <b>socio-economic status</b>. Additionally, people with more limited mobility, such as those with <b>disabilities</b> or <b>older people</b>, or <b>parents</b> with pushchairs, may be less attracted to homes in high rise buildings where their access would be very restricted if, for example, a lift broke.</p> <p>The limitation of tall buildings to specific sites within the borough may create areas</p>	<p>The policy could be amended to support the overall delivery of tall buildings as an appropriate proportion of overall housing delivery, both at a borough level and also at town or sub-town level.</p>



Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
		<p>where people who require specialist types of housing are not able to live, including <b>older people</b> and <b>people with disabilities</b>.</p> <p>No specific negative effects associated with this policy have been identified for the <b>ethnic minority, religion, gender reassignment, sexual orientation or sex</b> protected characteristics.</p>	
<b>Affordable Housing</b>	<p>The provision of affordable housing that meets identified need in terms of mix and tenure will likely benefit <b>all of the protected characteristic groups</b>, but particularly those with a <b>low socio-economic status</b>; those from certain <b>minority and ethnic groups</b> who may have different needs in terms of unit size; those with <b>disabilities</b> who may have specialist housing needs; and <b>young people</b> who may disproportionately struggle to afford housing.</p>	<p>No negative effects have been identified for <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+, pregnant people, those with disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p>	<p>The Policy could include wording to support the provision of specialist housing units for people with long-term <b>disabilities</b> and accessibility needs.</p>
<b>Large-scale Purpose Built Shared Living</b>	<p>Restricting large-scale, purpose-built shared living developments to Ealing Metropolitan Town Centre may support the delivery of a range of housing types which could increase the availability for more vulnerable groups, such as <b>older people</b> and people with <b>disabilities</b>.</p> <p>No specific positive effects associated with this policy have been identified for the <b>ethnic minority, religion, pregnancy and maternity, gender reassignment, sexual orientation or sex</b> protected characteristics.</p>	<p>The use of large-scale, purpose-built shared living developments may result in the overprovision of apartment style accommodation with limited internal and external space, negatively impacting housing choice for those in Ealing Metropolitan Town Centre, particularly <b>older people, families containing children, people with disabilities</b>, and groups with <b>low socio-economic status</b>.</p> <p>No specific negative effects associated with this policy have been identified for the <b>ethnic minority, religion, pregnancy and maternity, gender reassignment, sexual orientation or sex</b> protected characteristics.</p>	<p>The policy could be amended to ensure large-scale, purpose built housing is an appropriate proportion of the overall housing delivery within Ealing Metropolitan Town Centre.</p> <p>The policy could also incorporate design based standards to address the lack of policy detail regarding this accommodation type, such as setting minimum internal space, amenity and accessible design standards.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
<b>Small Sites Contribution</b>	The provision of affordable housing that meets identified need in terms of mix and tenure will likely benefit <b>all of the protected characteristic groups</b> , but particularly those with a low socio-economic status; those from certain minority and ethnic groups who may have different needs in terms of unit size; those with <b>disabilities</b> who may have specialist housing needs; and young people who may disproportionately struggle to afford housing.	No negative effects have been identified for <b>women</b> , people with <b>gender reassignment</b> , people who identify as <b>LGBTQ+</b> , <b>pregnant people</b> , those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b> .	N/A
<b>Affordable workspace</b>	<p>Affordable workspace would support a range of businesses, which could include small businesses and those owned by, and providing services for, <b>minority ethnic</b> groups.</p> <p>Affordable workspaces would provide local employment opportunities, and associated on-the-job training and potential job-related qualifications, supporting those with a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>No positive effects associated with this policy have been identified for the <b>gender reassignment</b>, <b>sex</b>, <b>disabilities</b>, <b>sexual orientation</b> or <b>pregnancy</b> and <b>maternity</b> protected characteristics.</p>	No negative effects associated with this policy have been identified for any protected characteristic.	The policy could be amended to include support for small businesses and those which directly support specific protected characteristic groups.
<b>Land for Industry, Logistics and Services to support London's Economic Function</b>	Maintaining and intensifying industrial land could support businesses which provide local employment opportunities, associated on-the-job training and potential job-related qualifications for <b>younger</b> and <b>working-age</b> people as well as those with a <b>low socio-economic status</b> , which generally disproportionately includes those with	No negative effects associated with this policy have been identified for any protected characteristic.	The policy could include reference to ensuring that allocation of non-designated land will not negatively impact any <b>protected characteristic groups</b> and where mixed development is deemed appropriate there will be affordable work and business spaces to ensure that people

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	<p><b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>No specific positive effects associated with this policy have been identified for the <b>pregnancy and maternity, gender reassignment, sexual orientation or sex</b> protected characteristics.</p>		<p>of a low <b>socio-economic</b> status can benefit.</p> <p>This policy could also be amended to include reference to public and active travel networks as supporting infrastructure.</p>
<b>Locally significant industrial sites</b>	<p>Management of Locally Significant Industrial Sites (LSIS) would support businesses which provide local employment opportunities, and potentially associated on-the-job training and potential job-related qualifications, supporting <b>younger</b> and <b>working-age</b> people as well as those with a <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>No specific positive effects associated with this policy have been identified for the <b>pregnancy and maternity, gender reassignment, sexual orientation or sex</b> protected characteristics.</p>	<p>No negative effects associated with this policy have been identified for any protected characteristic.</p>	<p>This policy could be amended to:</p> <ul style="list-style-type: none"> <li>• include reference to supporting industrial and mixed-use businesses which provide training opportunities; and</li> <li>• include reference to public and active travel networks as part of the supporting infrastructure.</li> </ul>
<b>Town Centres</b>	<p>Certain mixed uses delivered through the policy could provide services and opportunities which specifically support groups such as <b>younger</b> or <b>older people, women</b>, those with <b>disabilities</b> and people who identify as <b>LGBTQ+</b>. The mixed uses delivered through the policy could also provide a range of spaces which could support <b>minority-owned</b> businesses across the borough.</p> <p>The policy would also provide local employment opportunities, and associated on-the-job training and potential job-related qualifications, supporting those with a <b>low socio-economic status</b>, which generally disproportionately includes those with</p>	<p>The policy could increase activity in town centres during night-time, which may lead to increased risk and vulnerability for certain groups, such as <b>women</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>No negative effects associated with this policy have been identified for the <b>age, socio-economic status, pregnancy and maternity</b> and <b>disability</b> protected characteristic groups.</p>	<p>The policy could be amended to:</p> <ul style="list-style-type: none"> <li>• commit to providing a diverse range of services and opportunities, including those which support vulnerable groups;</li> <li>• ensure town centres are safe, especially for night-time uses;</li> <li>• support mixed uses which provide training opportunities; and</li> </ul> <p>support affordable mixed uses to ensure that people of a low <b>socio-economic</b> status can benefit from them.</p>

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	<p><b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>Ensuring that the 20 minute city principle is met could benefit a range of groups, such as <b>maternity and pregnancy</b>, people with <b>disabilities</b>, and the <b>elderly</b> through improvements in accessibility to local services. The principle would also improve access to green and open spaces, which could provide a number of opportunities to improve quality of life across <b>all protected characteristic groups</b>.</p> <p>The policy would ensure that mixed uses and open spaces are accessible, meaning that less mobile individuals, such as the <b>elderly</b> or those with <b>disabilities</b>, would be adequately supported.</p>		
<b>Open Space</b>	<p>The delivery of open space could provide a number of opportunities to improve quality of life for all residents of the borough within <b>all protected characteristic groups</b>.</p> <p>In particular, depending on type of open space, they may support certain smaller businesses, such as cafes or outdoor exercise clubs, providing opportunities for people with <b>low socio-economic status</b>, which generally disproportionately includes those with <b>disabilities</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p> <p>The provision of open space infrastructure, such as play spaces, would directly benefit <b>younger</b> people, as well as groups going through <b>pregnancy</b> and <b>maternity</b>, and potentially <b>people with disabilities</b>.</p>	<p>Poorly designed open spaces may attract activities that can unintentionally lead to crime and anti-social behaviour and may lead to increased risk and vulnerability for certain groups, such as <b>women, people with gender reassignment</b>, people who identify as <b>LGBTQ+</b> and <b>minority ethnic</b> and <b>religious groups</b>.</p>	<p>This policy could be amended to:</p> <ul style="list-style-type: none"> <li>include reference to the creation of safe and welcoming open spaces; and</li> </ul> <p>support inclusivity through accessible and inclusive design.</p>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
<b>Urban Greening</b>	Urban greening is considered to bring a number of positive benefits for <b>all protected characteristic groups</b> , mainly by delivering improvements to residents' quality of life.	No negative effects associated with this policy have been identified for any protected characteristic.	The policy could include reference to ensuring the provision of locally appropriate urban greening opportunities. These could include, for example, green routes that promote active travel, as well as the delivery of publicly accessible open space to reduce local deficiencies in access to open space. Where urban greening initiatives are intended to be interacted with/used by the public, the policy could make reference to making them accessible and inclusive to all.
<b>Carbon Offsetting</b>	Making Ealing carbon neutral by 2030 is considered to bring a number of positive benefits for <b>all protected characteristic groups</b> , mainly by decreasing the effects of climate change that would otherwise negatively affect Ealing's population. It is also considered that the retrofitting of existing housing stock and implementation of appropriate residential housing standards would improve the standard of living for all groups of society, especially those with a <b>low socio-economic status</b> . The implementation of these standards in residential and commercial uses may also result in energy-related cost savings owing to improvements in energy efficiency. This would also benefit those of a <b>low socio-economic status</b> in particular.	No negative effects associated with this policy have been identified for any protected characteristic.	
<b>Funding the Local Plan</b>	Promoting improvements in physical, social and green infrastructure will likely benefit <b>all of the protected characteristic groups</b> as they will reflect local priorities.	No negative effects have been identified.	The improvements to all types of infrastructure should meet community needs and be accessible to all.
<b>Enabling Development</b>	Depending on its nature, the provision of enabling development regardless of local policy and designations has the potential to positively affect	Depending on its nature, the provision of enabling development regardless of local policy and designations has the potential to	The policy could include reference to ensuring that enabling development will take the needs of <b>all protected characteristic</b>

Policy	Positive Effects	Negative Effects	Mitigation / Recommendations
	<p><b>all protected characteristic groups.</b> For example, provision of affordable housing in place of a significant heritage designation would benefit those of a <b>low socio-economic status</b>,</p> <p>Construction and operation associated with enabling development would additionally provide employment and training opportunities which could benefit those of a <b>low socio-economic status</b> as well.</p>	<p>negatively affect <b>all protected characteristic groups.</b> For example, the provision of commercial space in place of a place to worship will negatively affect <b>religious groups.</b></p>	<p><b>groups</b> into account during decision making.</p>

### 3.3.5 Policy modifications based on EqIA

EqIA recommendations that have been incorporated included minor wording changes to ensure consistency across the policies, other recommendations included:

- references to affordable workspace, particularly across the Town policies,
- ensuring employment opportunities for all, particularly those from lower socio-economic backgrounds,
- ensuring night-time spaces, open spaces and the urban environment as a whole is safe and inclusive for everyone.

## 4. Habitats Regulation Assessment

### 4.1 Introduction

This section summarises the HRA, which is a discrete process, with the full assessment set out in Appendix E.

European Council Directive 92/43/EEC on the Conservation of natural habitats and of wild flora and fauna (the 'Habitats Directive') requires that any plan or programme likely to have a significant impact upon Special Areas of Conservation (SAC), Special Protection Areas (SPA), and Ramsar sites, which is not directly concerned with the management of the site for nature conservation, must be subject to an Appropriate Assessment. This process is referred to as a Habitats Regulations Assessment (HRA).

### 4.2 Methodology

HRA screening has been undertaken to determine whether the Local Plan would cause an adverse impact on the integrity of protected areas, in terms of their conservation objectives and qualifying interests. The following steps were completed as part of the assessment:

- Identification of all National Site Network (NSN) sites potentially affected (including those outside of the LB Ealing Local Plan area for which the impact pathways have been identified);
- A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats
- A review of the policies which have the potential to affect the NSN sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the policy, in line with guidance from Natural England); and
- A consideration of impacts in combination with other plans or projects

This process is documented further in a Screening Report set out in Appendix E.

### 4.3 HRA Summary

None of the policies set out in the LB Ealing Local Plan would lead to direct impacts upon NSN sites. The significance of the potential effects was assessed taking into account clearly established and uncontroversial standard construction industry practices that are required by current UK legislation.

It is proposed that this assessment should not progress to Stage 2 of the HRA process (Appropriate Assessment). However, it is recommended that any future development applications within the LB Ealing should be subject to a detailed project level HRA, to reduce the residual potential for adverse effects on the NSN sites over time.

## 5. Next steps

This report will be subject to public consultation alongside the draft Local Plan. The Regulation 18 consultation process will occur over an 8-week period, it will run from November 30<sup>th</sup> until January 25<sup>th</sup>.

During the Regulation 18 consultation there will be a variety of ways stakeholders can comment on the draft New Local Plan, this includes in-person events, a digital platform, and traditional methods such as printed versions of the document distributed to libraries across the borough.

All consultation feedback received will be considered and inform an amended version of the New Local Plan, called the Proposed Submission Local Plan (Regulation 19). A Final IIA Report will then be delivered alongside this report.

The Local Plan and IIA Report will then be subject to public examination. Following this, if amendments to the Local Plan are required, the IIA will be updated prior to the publication of the adopted version of the Local Plan.

A Post-Adoption Statement will then be published shortly after the adoption of the Local Plan, as per the requirements of the SEA Regulations. This will set out:

- how environmental, health and equalities considerations have been taken into account as part of developing the Local Plan;
- how the opinions expressed by consultees have been taken in to account;
- the reasons why the preferred options of the Local Plan were taken forward and why reasonable alternatives were discounted; and
- key indicators which will be used to monitor the effects of the Local Plan objectives in terms of achieving the IIA objectives set out in the IIA framework.

Ealing Council will monitor the significant effects of the implementation of the plan with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.



## Appendix A

### Scoping Report consultation responses

This appendix summarises the comments received during the consultation of the IIA Scoping Report and describes how these comments have been addressed.

Stakeholder	Summary of comment	Response
Environment Agency	<p>On the topic of water and flood risk 'avoid increasing flood risk, including constructing development in areas of high flood risk' is stated to be a key consideration. We are pleased to see this included in the IIA Scoping Report. It might be useful moving forward to identify areas (and these may include cross boundary flood risk issues) where particular and cumulative flood risk issues exist, and to develop actions and policy approaches aimed at reducing these risks.</p> <p>This might be addressed in the Local Plan or under Table 27: IIA framework on page 52, in reference to object 12. Climate Change adaptation to 'Promote design which can withstand the impacts of future climate change events (such as overheating or flooding)'.</p>	<p>Cumulative flood risk impacts are considered within the IIA policy assessment as appropriate, as set out in Sites Assessment (0) and the Policy Assessment (Section 2).</p>
	<p>The baseline section uses the terms "non-aquifer" and "major aquifer". Please note that these terms were replaced effective from 1 April 2010, to be consistent with the Water Framework Directive (WFD) and should also be updated in this document.</p> <p>It should also be noted that the superficial Taplow Gravels to the southwest of the borough are classed as a Principal Aquifer – defined as an aquifer that can provide significant quantities of water (both potable and for business needs) and can support water supply and/or baseflow to rivers, lakes and wetlands on a strategic scale. Please see the Environment Agency's Approach to Groundwater Protection for types of development proposals that we would object to within a Principal Aquifer (i.e. D3 -sub water table storage of hazardous substances and E1 –landfill location).</p> <p>The Upper Chalk aquifer should be considered for developments where deep piled foundations are proposed. Should foundations works penetrate through the London Clay to the Chalk then it is likely that a Foundation Works Risk Assessment (FWRA) would be required to ensure that the risks to groundwater are minimised.</p>	<p>The baseline has been updated in relation to aquifers (0)</p> <p>The Sites Assessment considers impacts on flood risk and groundwater as appropriate. Aspects such as foundation levels would be considered at a more detailed planning stage, for example as part of an application for a development on site.</p>
	<p>Brownfield sites, especially those with industrial former uses, may be contaminated. We note that the requirements for remediation of contaminated land have not been discussed with respect to redevelopment of brownfield sites. With respect to contaminated land issues:</p>	<p>The IIA objective regarding brownfield sites has been amended to reflect the need for remediation of contamination issues (see</p>

Stakeholder	Summary of comment	Response
	<p>Specific National Planning Policy Framework (NPPF) paragraphs 174 and 183 should be considered.</p> <p>Relevant guidance such the Environment Agency's Approach to Groundwater Protection and Land Contamination Risk Management (LCRM) should be promoted.</p> <p>The Approach to Groundwater Protection should be considered with regard to development proposals that we would object to in principle.</p> <p>Policies should require developers to submit a Preliminary Risk Assessment (PRA) together with a planning application where land is potentially contaminated.</p> <p>Policies should require developers to ensure sites are suitable or made suitable for intended use.</p> <p>Policies should require developers to prevent discharges to ground through land affected by contamination.</p>	<p>IIA Framework in Table 1).</p> <p>Relevant guidance has been included in the updated policy review <b>(Error! Reference source not found.)</b>.</p> <p>Recommendations regarding policies are considered as appropriate in the IIA policy assessment (Section 2).</p>
	<p>There is no reference for the following statement under 4.11.2 Climate change trends: 'Despite London's relatively adaptable and resilient water supply, the city is at risk of drought following two dry winters. Average daily water consumption in London is already over 10% higher than the national average and it is forecasted that by 2040 London will have a water supply deficit of 400m litres per day.' This statement contradicts itself; a resilient water supply would not forecast over abstraction.</p>	<p>The IIA baseline has been updated and amended in line with this comment (0).</p>
	<p>Ground Source Heating and Cooling (GSHC) systems use energy stored in the ground to heat or cool buildings. They can deliver a more efficient and renewable source of energy than conventional heating and cooling methods. GSHC systems fall into one of two categories –closed loop and open loop. Under normal operation, closed loop systems do not require any permits from us. The Environment Agency regulates open-loop ground source heating and cooling schemes. Proposed developments would require:</p> <p>a groundwater investigation consent (section 32/3 of the Water Resources Act 1991) to drill and test pump</p> <p>a full abstraction licence (Water Resources Act 1991), if the volume of groundwater abstracted is greater than 20 m3/day</p> <p>an exemption, if it meets the criteria for a low risk activity, or environmental permit (under the Environmental Permitting (England &amp; Wales) Regulations 2016 to discharge</p> <p>Applicants would be advised to contact the Environment Agency on 03708 506 506 for pre-permit application discussions. Further guidance can be found at: <a href="https://www.gov.uk/government/publications/new-">https://www.gov.uk/government/publications/new-</a></p>	<p>The Sites Assessment considers energy consumption and efficiencies as appropriate. Aspects such as the specific type of heat and cooling systems and licencing would be considered at a more detailed planning stage, for example as part of an application for a development on site.</p>

Stakeholder	Summary of comment	Response
	<p>ground-source-heating-and-cooling-scheme-form-and-guidance-notes.</p> <p>The Environment Agency Good Practice Guide relating to the installation and operation of open and closed loop ground source heating and cooling systems can be found on the Ground Source Heat Pump Association website at:  <a href="http://www.gshp.org.uk/pdf/EA_GSHC_Good_Practice_Guide.pdf">http://www.gshp.org.uk/pdf/EA_GSHC_Good_Practice_Guide.pdf</a>.</p>	
	<p>We are pleased to see the recommendation for increasing the number of flood storage areas. We would like to see that these Natural flood management methods are included in development proposals to promote the multiple benefits that not only include increasing flood storage as well as creating recreational areas habitat, open spaces. 'Ensure developments steered to the areas of lowest risk of flooding' is part of the Sequential and Exception Test in the NPPF. We would like to see in addition to this a suggestion that measures to address flood risk will be integral to development proposals and considered early in the design process. To strengthen this section, we recommend the additional consideration 'Ensure developments protect and enhance the river corridor and habitats.'</p>	<p>The IIA objectives and guiding questions regarding flood risk and the protection and enhancement of river corridors have been amended in line with these comments (see IIA Framework in Table 1).</p>
	<p>It is unclear why groundwater issues have been included in the key considerations in Section 3.5 for Water &amp; Flood Risk, and then not discussed at all in Section 4.12 Water and flood risk.</p>	<p>The IIA baseline has been updated include a paragraph on groundwater (0).</p>
	<p>Table 26 outlines that there will be increased promotion of SuDS solutions. The discussion of SuDS solutions should be expanded to consider the need for an Environmental Permit for discharges of surface water run-off at sites where land is potentially contaminated. See section G11 of the Environment Agency's Approach to Groundwater Protection: "Discharges of surface water run-off to ground at sites affected by land contamination, or from sites used for the storage of potential pollutants are likely to require an environmental permit. This applies especially to sites where storage, handling or use of hazardous substances occurs (for example, garage forecourts, coach and lorry parks/turning areas and metal recycling/vehicle dismantling facilities). These sites will need to be subject to risk assessment with acceptable effluent treatment provided."</p>	<p>The Sites Assessment considers SuDs and flood risk as appropriate. Aspects such as specific permits would be considered at a more detailed planning stage, for example as part of an application for a development on site.</p>
	<p>Water resources have been included in 4.11 Climate Change. Whilst the current and future forecasted pressures associated with water resources in London are exacerbated by climate change, they are exclusive of climate change. The section should highlight these pressures and how they will be considered, i.e. water neutrality, sustainable housing etc. Furthermore, we</p>	<p>Water resource pressures have been included within the Water and flood risk section of the baseline.</p> <p>There is a guiding question for the Water and</p>

Stakeholder	Summary of comment	Response
	recommend the borough's blue network is given consideration, in reference to WFD objectives.	flood risk objective that considers safeguarding water resources and supporting the efficient use of water.
	Framework objective 7. Resources and land use, should be expanded to consider land contamination issues at brownfield sites. A key guiding question should be "Does the local plan ensure remediation of contaminated land at brownfield sites?" Our comments on Section 4.8.2 are relevant to the above guiding question.	The IIA objectives and guiding questions regarding resource and land use have been amended in line with this comment (see IIA Framework in Table 1).
	Framework Objective 10. Water Resources of Table 27 should be expanded to consider groundwater as well as surface water. Again, a key guiding question should be "Does the local plan protect groundwater and enhance groundwater quality?" The "protect groundwater" wording of this guiding question considers both groundwater quality and quantity issues. Development should not be a detriment to groundwater flow or quantity, nor should it be a detriment to groundwater quality. We also reiterate consideration of Environmental Permit requirements for SuDS solutions at sites affected by land contamination.	The IIA objectives and guiding questions regarding groundwater have been amended in line with this comment (see IIA Framework in Table 1).  Aspects such as specific permits would be considered at a more detailed planning stage, for example as part of an application for a development on site
	Section 10 (Water Resources) of Table 28 discusses Source Protection Zones (SPZs) as a potential indicator for site assessment. This should be expanded to also consider:  •Groundwater Vulnerability of a location •Aquifer Designation of a location	The baseline is based on open source and publicly available data and the evidence presented in the 0.
	Relevant plans, policies and programmes should include:  •Multi-agency Flood Plan •Surface Water Management Plan •A new Water Cycle Study for the London Borough of Ealing	Relevant guidance has been included in the updated policy review ( <b>Error! Reference source not found.</b> ).
<b>Historic England</b>	There are a number of other relevant plans and programmes that should be included in Section 3 <i>Relevant Plans, Policies and Programmes</i> , and Section A.1.9.1 these include:  Convention for the Protection of the Architectural Heritage of Europe  Planning (Listed Buildings & Conservation Areas) Act 1990  Ancient Monuments & Archaeological Areas Act 1979	Relevant guidance has been included in the updated policy review ( <b>Error! Reference source not found.</b> ).

Stakeholder	Summary of comment	Response
	Local Conservation Area Appraisals and Management Plans	
	We are pleased to reference to Ealing's designated heritage assets and Archaeological Priority Areas (APAs). However, we advise that the IIA also considers local views and listed buildings on the Heritage at Risk Register. The IIA also makes no reference to non-designated heritage assets, or to the setting of heritage assets. The Local Plan has the potential to impact upon all elements of the historic environment, both positively and negatively, it is therefore important that the IIA process is robust to predict the likely trajectory of local plan's implications.	The IIA objectives and guiding questions regarding local views and heritage at risk have been amended in line with this comment (see IIA Framework in Table 1).
	The local Historic Environment Record (HER) should form part of the baseline evidence with regards to the historic environment, along with its archives and Local Studies department. Historic England's Greater London Archaeological Service (GLAAS) maintains the Greater London Historic Environment Record (GLHER) which aims to cover all aspects of the capital's historic environment.	The baseline is based on open source and publicly available data and the evidence presented in the 0.
	Objective 8 addresses heritage and townscape. We advise that the setting of heritage assets is included in the objective and it should also feature in the guiding questions, for example:  <i>Protect, conserve or enhance the significance of heritage assets and their setting? <del>conservation areas and other heritage assets?</del></i>	The IIA guiding question and approach to the sites assessment local views and heritage at risk have been amended in line with this comment (see IIA Framework in Table 1).
	We would recommend the term "historic environment" is used instead of "heritage" within the objective as it encompasses all aspects of cultural heritage and would achieve a more robust assessment of impact to a wider spectrum of relevant variables.	Terminology has been updated throughout.
	It would be helpful if the Scoping Report recognises the adverse impacts that other aspects such as transport and carbon emissions could have upon the historic environment. Traffic and pollution for example can result in emissions which affect the historic environment, as well as noise and vibration detracting from the setting of heritage assets and adversely affecting people's enjoyment of it, or the increase in environmental aggressors deriving from emissions which could accelerate the erosion and decline of historic fabric.	Effects from all topic areas has been considered as part of the assessment (Section 2).
	The IIA would be improved if a question was added which sought the explore the ability of the emerging Plan to deal with the effects of unknown heritage assets on the development proposals. For example, how will the plan deal with development proposals in areas with archaeological potential but with no known designated or non-designated heritage assets and	Aspects such as the impact on unknown archaeology would be considered at a more detailed planning stage, for example as part of an

Stakeholder	Summary of comment	Response
	does the Plan outline how this situation is to be addressed by prospective applicants.	application for a development on site
	The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgement based on site visits and the available evidence base.	Historic environment indicators for the sites assessment have been expanded from proximity measures to allow for consideration of a wider context including the overall contribution of the site to the historic environment.  The baseline is based on open source and publicly available data and the evidence presented in the 0.
	Monitoring should seek to identify unforeseen adverse effects and enable appropriate remedial action regarding the plan's implementation. Guidance on indicators and monitoring in respect of the historic environment can be found in the advice note.	Monitoring indicators will be set out in the Post-adoption statement and aligned to the monitoring requirements of the Local Plan.
<b>Natural England</b>	No comments were received on the IIA Scoping Report.	



# Appendix B

## Updated IIA baseline

### 1. Baseline Information and Key considerations

This integrated baseline provides the basis for assessing the likely significant effects of the Ealing Local Plan. It describes the existing situation in Ealing, and where available, also describes future trends.

The scope of the baseline covers all component parts of the IIA, describing information in relation to the environment, health and equalities. It also incorporates other topics relevant to the Local Plan development, such as transport and housing. A summary of the key baseline features and considerations for the IIA and Local Plan are set out at the end of each topic section.

The baseline uses information from a range of publicly available sources, including data collected by Office for National Statistics (ONS), Greater London Authority, Public Health England and Transport for London. Data collected by Ealing Council is also included in the baseline, including monitoring reports from their previous Local Plan<sup>1</sup>.

The COVID-19 pandemic, which began to severely impact the UK in 2020, will have had a substantial effect on several topics discussed within the baseline, including health and well-being, economy and employment, transport and air quality. The effects of the pandemic have been experienced differently by different groups of people, in particular according to age, race, income and occupation<sup>2</sup> and are interlinked with multiple other inequalities that are represented within the baseline. Effects may be short-term or long-term, and may not yet be reflected in the most recent data available. Where a COVID-19 effect appears within the data, or has not yet appeared but may impact future trends, this is noted in the relevant sections.

#### 2021 Census results

The 2021 census results were released on 28<sup>th</sup> June 2022. The population of Ealing was recorded as approximately 367,100, making it the third largest borough in London after Croydon and Barnet. The population increased 8.47% between 2011 and 2021 which was higher than the ONS projected figure and higher than the rate of growth for London and England.

The age profile of Ealing is similar to that of London but much younger when compared the age profile of England. Ealing has seen a decline in the number of children ages 0-4 and young adults aged 20 to 34. However, there has been an increase in children aged 5 to 19 years and people aged 65 years and over. This reflects Ealing's declining birth rate and suggests there is an aging population.

Ealing's population is approximately 50.7% female to 49.3% male. This aligns with the national split of 51.0% female and 49.0% male.

'Census Day' was 21<sup>st</sup> March 2021 and respondents were required to complete the census based on their place of residence on that day. As this was during the covid-19 pandemic and some lockdown measures were still in place, there are questions over the accuracy of the data. It is likely

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<sup>1</sup> Ealing Council 2021. Interim Authorities Monitoring Reports 2014-2019. Available online at: [https://www.ealing.gov.uk/downloads/download/560/annual\\_monitoring\\_report\\_amr](https://www.ealing.gov.uk/downloads/download/560/annual_monitoring_report_amr)

<sup>2</sup> PHE 2020, Disparities in the risk and outcomes of COVID. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/908434/Disparities\\_in\\_the\\_risk\\_and\\_outcomes\\_of\\_COVID\\_August\\_2020\\_update.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf)

that students, younger people and workers on furlough may have temporarily relocated to family homes outside of London resulting in an under representation of these groups in the London figures. This in turn could have impact future policies and funding allocation.

## 1.1 Population, demographics and equality groups

### 1.1.1 Population

The population of Ealing is around 342,000 people. Table 1 shows that the population is predicted to decline by 2031, a contrast to London and England projections<sup>3,4</sup>.

**Table 1: Population estimates and projections**

	Midyear population estimates 2020	Projected population 2031	Projected population % increase 2020-2031
Ealing	341,982	335,119	-2%
London	8,908,081	9,431,095	6%
England	55,977,178	59,389,102	6%

### 1.1.2 Population density

Ealing has an average population density that is higher than the London average and considerably higher than the national average

Figure 1)<sup>5</sup>. Population density varies substantially across different areas within the borough (Figure 2)<sup>6</sup>.

<sup>3</sup> ONS 2020. Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland . Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

<sup>4</sup> ONS 2018. Population projections for local authorities. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

<sup>5</sup> ONS 2020. Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

<sup>6</sup> ONS 2020. Lower layer Super Output Area population density. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/lowersuperoutputareapopulationdensity>



Figure 1: Population density

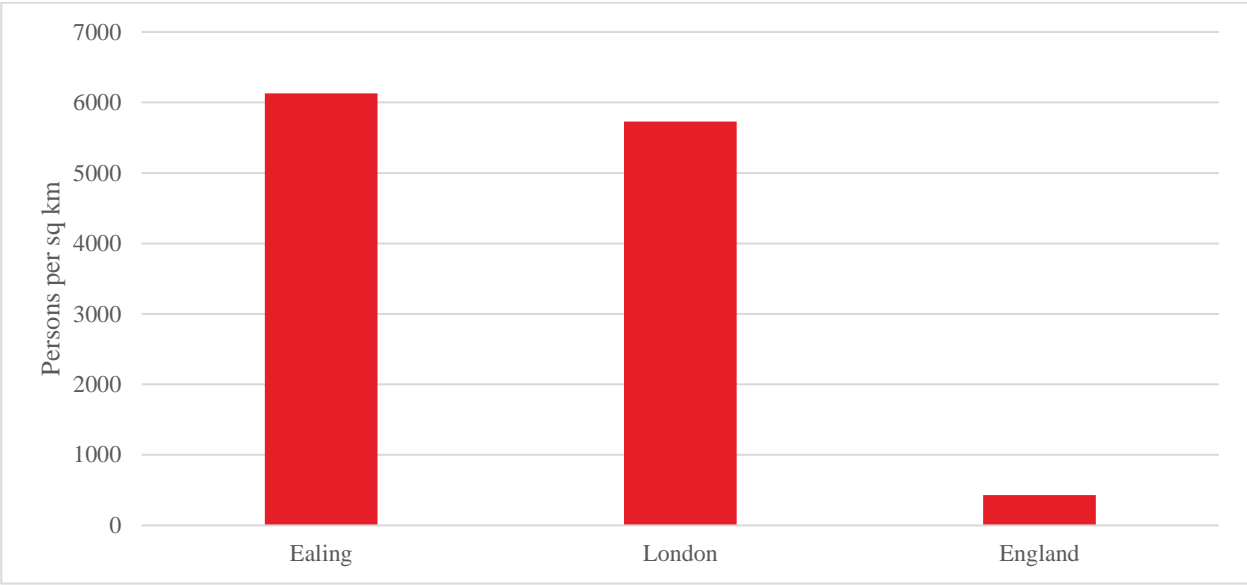
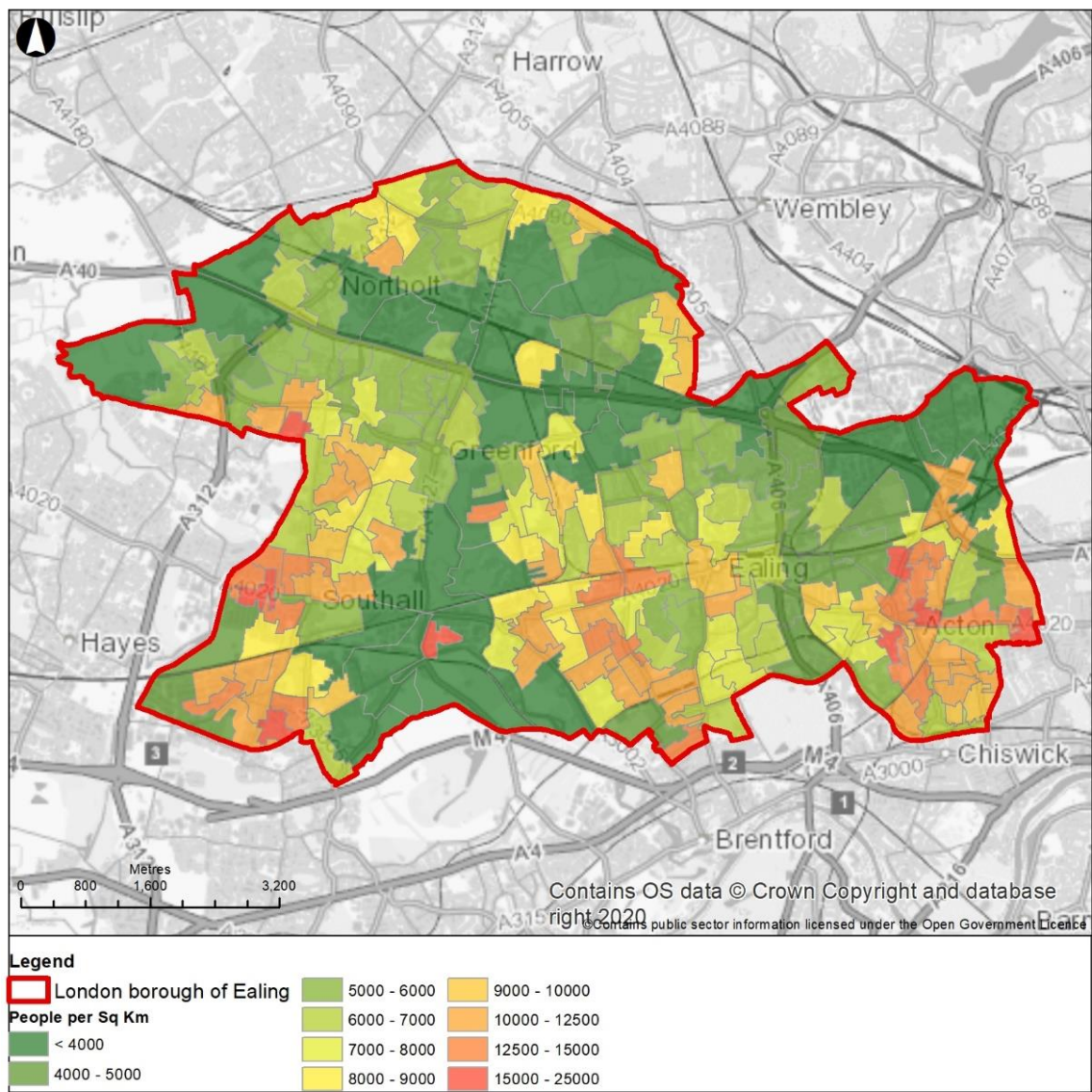


Figure 2: Population density in Ealing

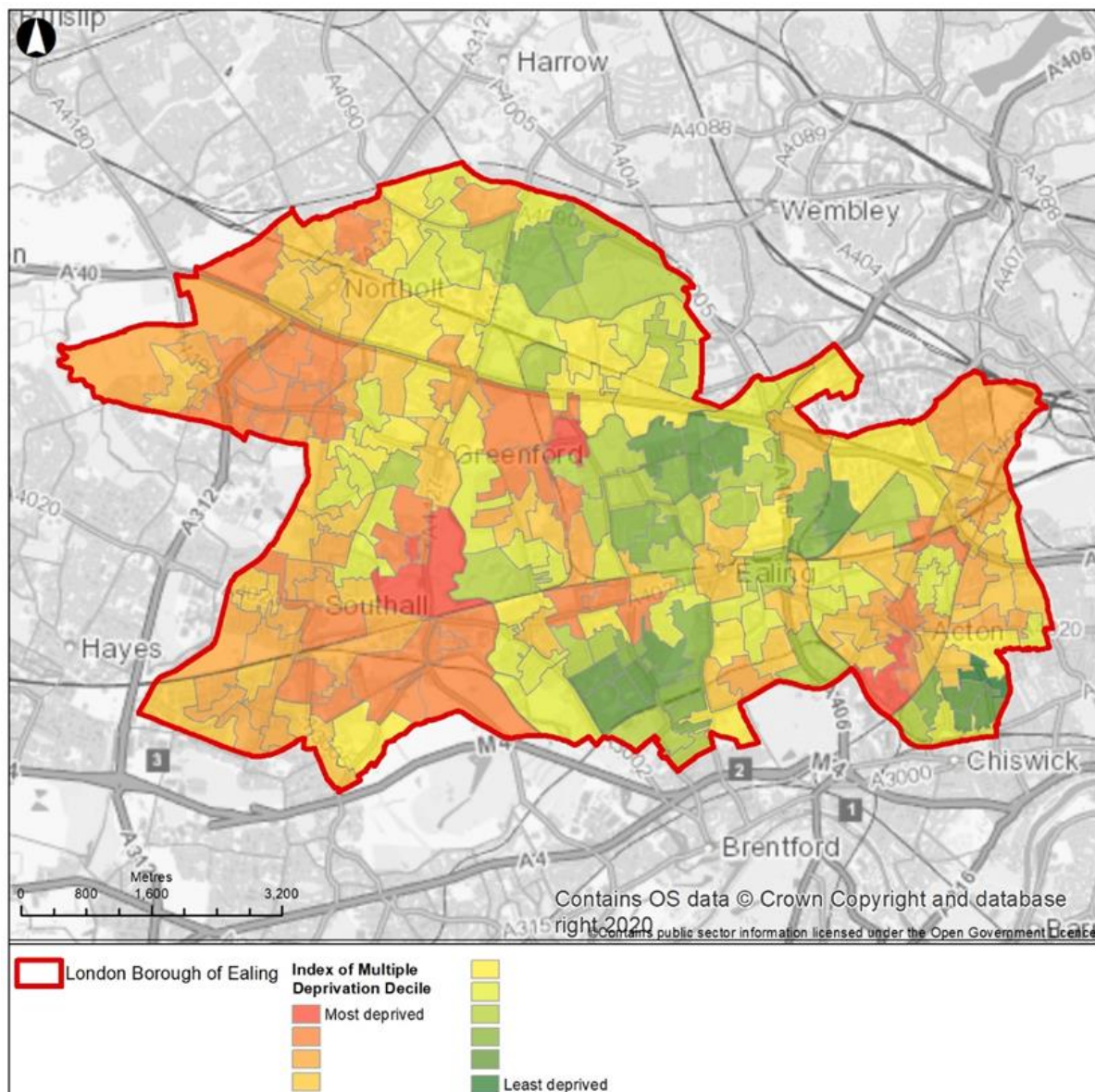


### 1.1.3 Deprivation

The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation in England, based on 39 separate indicators across seven key domains (income; employment; health deprivation and disability; education skills and training; crime; barriers to housing and services; and living environment). Deprivation is distinct from living on a low income in that people are considered deprived if they lack any kind of resources, not just income.

The IMD in Ealing varies substantially across the borough, and there are a number of pockets of deprivation, particularly in the west (Figure 3)<sup>7</sup>.

**Figure 3: Deprivation in Ealing**



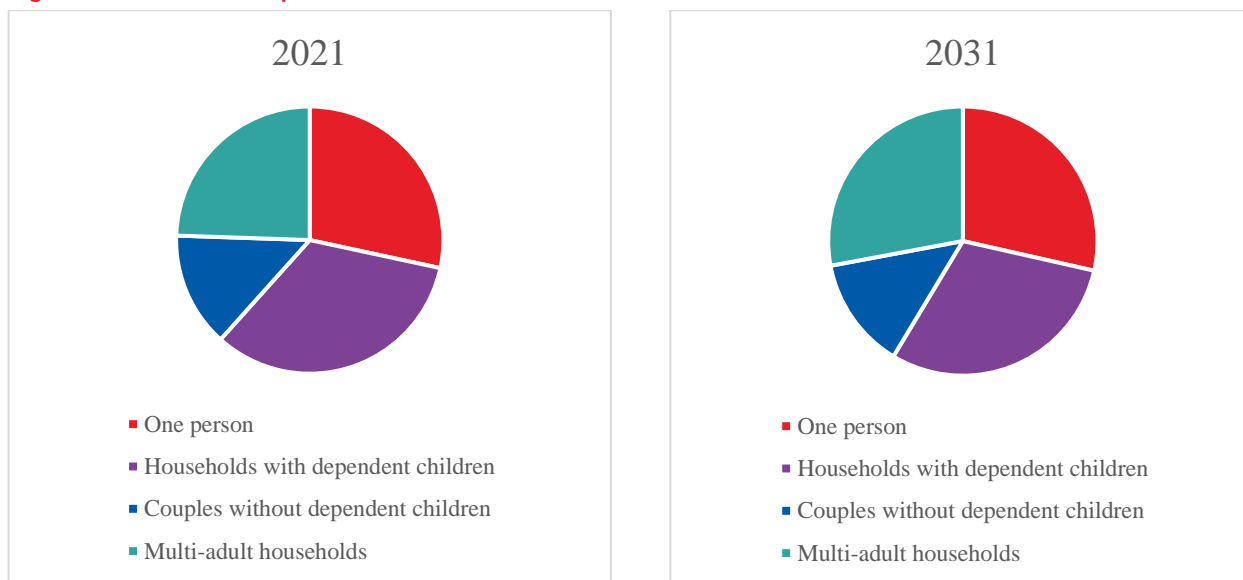
<sup>7</sup> ONS 2019. English indices of deprivation. Available online at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

#### 1.1.4 Household composition

Within Ealing there are an estimated 144,369 households. Figure 4 illustrates estimates for current and future household composition<sup>8</sup>.

The most common type of household currently is those with dependent children. It is estimated that by 2031, households with dependent children will account for a smaller proportion of household composition and will be broadly comparable to the proportions of both single person and multi-adult households. In both 2021 and 2031, couples without dependent children make up the smallest proportion of households.

**Figure 4: Household composition: 2021 and 2031**

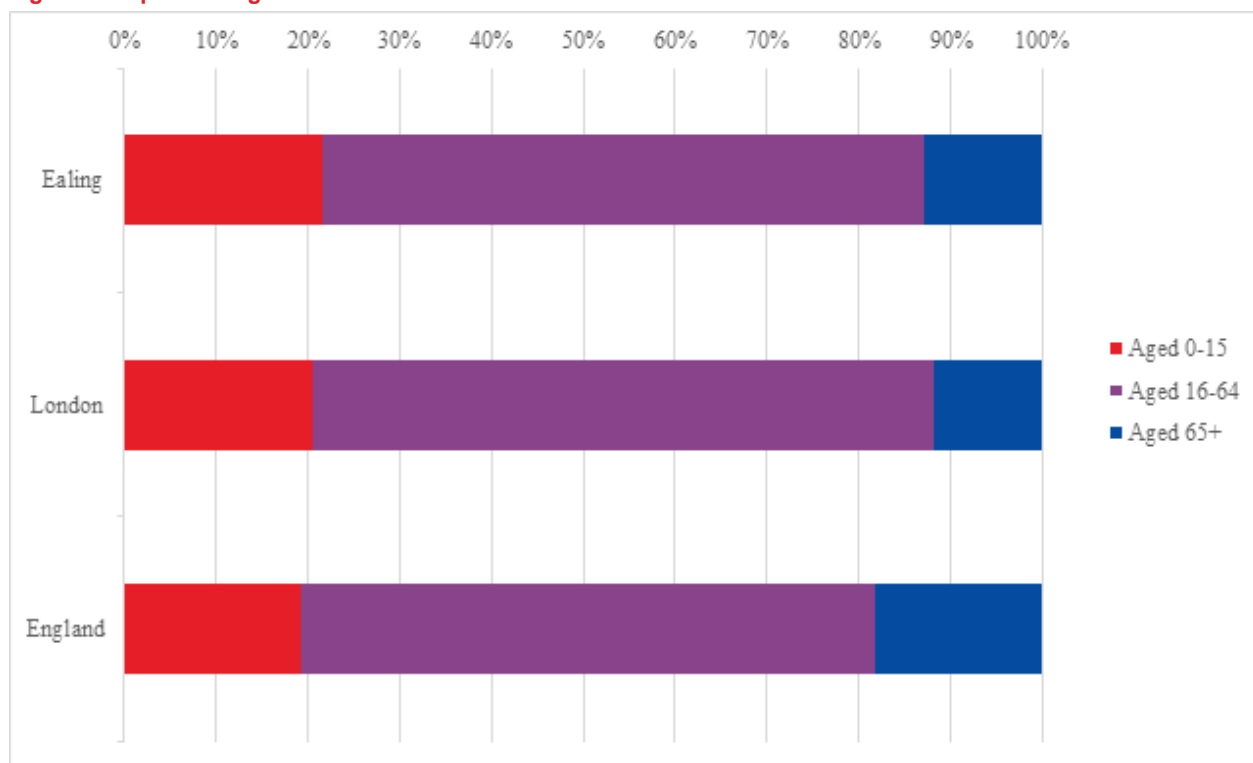


#### 1.1.5 Age

Ealing has an average population aged 0-15, a population aged 16-64 that is in line with the London average but higher than the national average, and a population aged 65+ that is in line with the London average but lower than the national average (Figure 5)<sup>3</sup>.

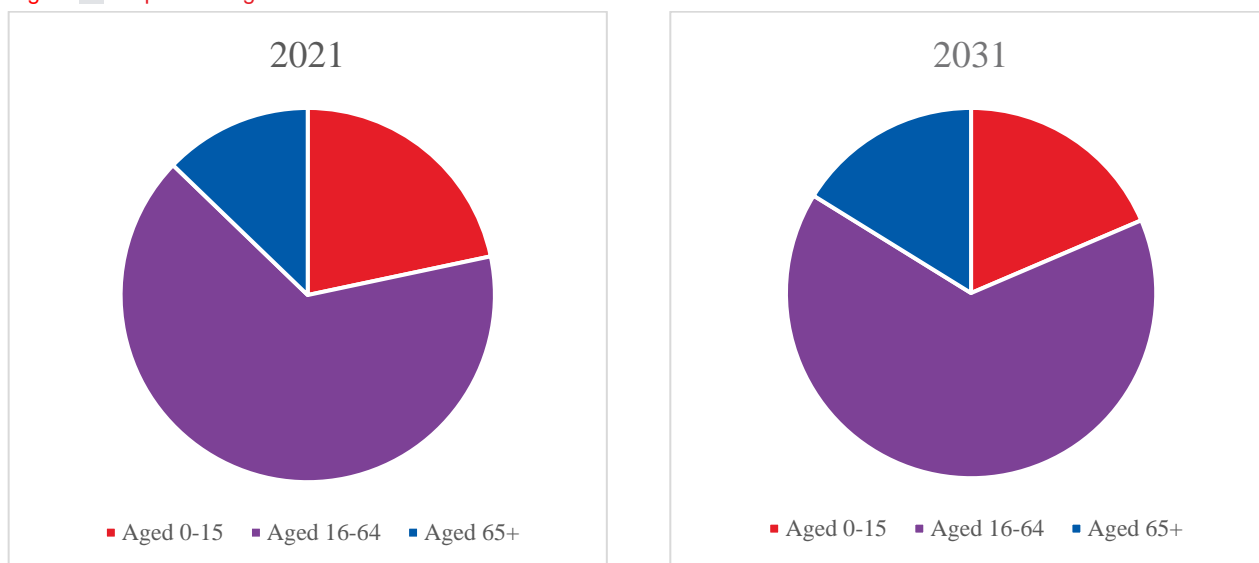
<sup>8</sup> GLA 2015. GLA Household projections. Available online at: [https://www.ealing.gov.uk/downloads/download/1330/household\\_projections](https://www.ealing.gov.uk/downloads/download/1330/household_projections).

**Figure 5: Population age breakdown**



There is projected to be a small decrease in the proportion of the population aged 0-15 by 2031, and a small increase in the proportion of the population aged over 65 (Figure 7b)<sup>3</sup>.

**Figure 7b: Population age breakdown: 2021 and 2031**



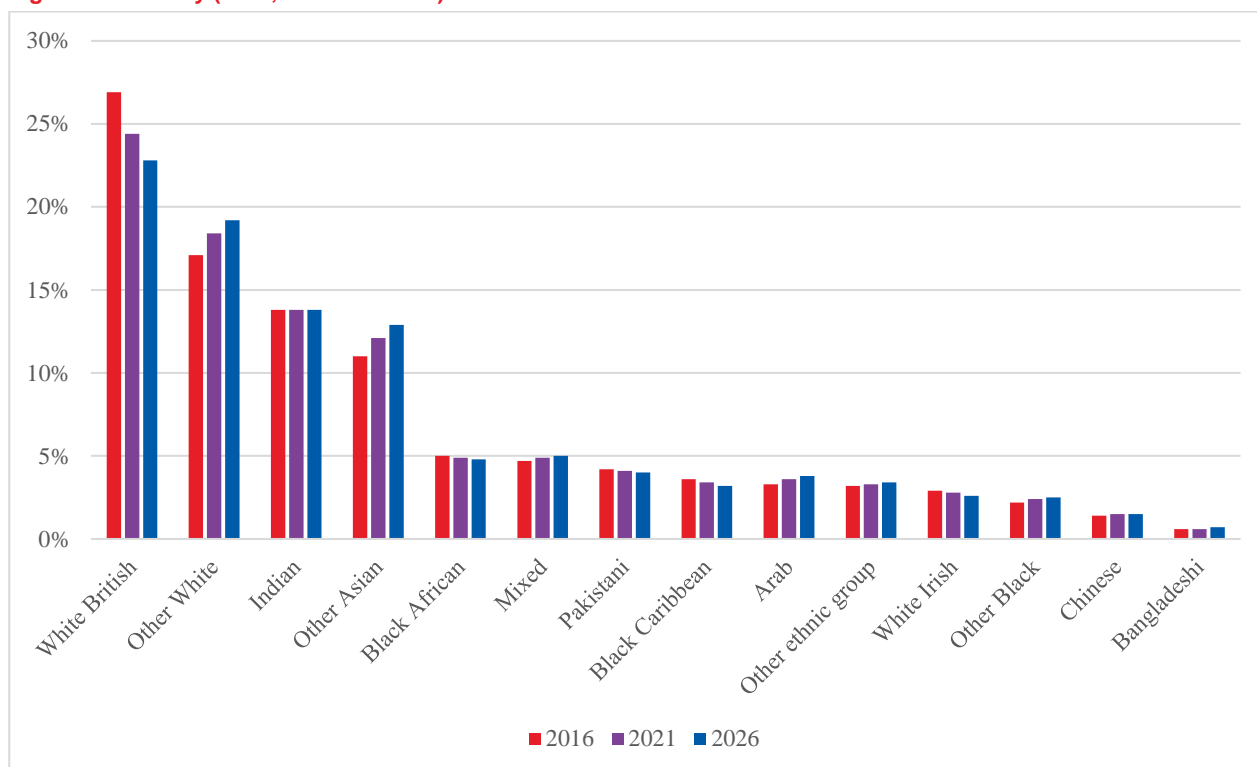
### 1.1.6 Ethnicity

Ealing is ethnically diverse (Figure 6)

Figure 6<sup>9</sup>. Ethnicity trends are broadly stable, with a minor reduction in the 'White British' group and minor increases in the 'Other White' and 'Other Asian' groups between 2016 and 2026.

<sup>9</sup> GLA, 2015. Ethnic Group Population Projections. Available online at: [https://www.ealing.gov.uk/downloads/download/4164/ethnic\\_group\\_population\\_projections\\_egpp](https://www.ealing.gov.uk/downloads/download/4164/ethnic_group_population_projections_egpp)

**Figure 6: Ethnicity (2016, 2021 and 2026)**



According to the 2011 Census, Ealing had a UK-born population of 52%, lower than the regional and national averages at 63% and 87% respectively<sup>10</sup>. Although these figures are likely to have changed, the broad comparison that Ealing has a large foreign-born population is likely to have remained accurate.

### 1.1.7 Religion or belief

The percentage of residents in Ealing belonging to different religions varies substantially compared to both the regional and national figures (Figure 7)<sup>11</sup>.

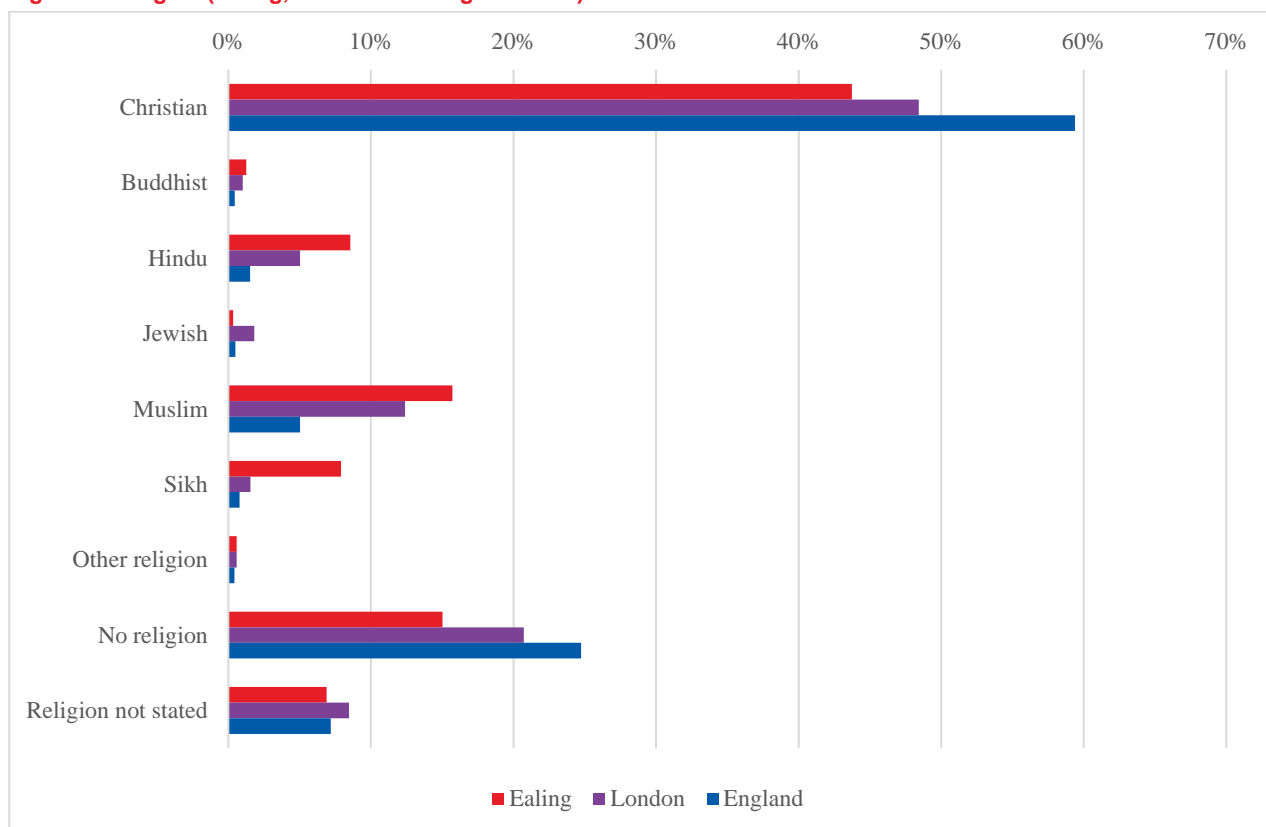
The most common religion is Christianity, although this is lower than London, and significantly lower than the national figure. Ealing has large Hindu and Muslim populations, a significantly larger Sikh population, and a small population of those who actively state that they have no religion.

<sup>10</sup> ONS Census, 2011. Dataset: KS204EW- Country of birth. Available online at: <https://www.nomisweb.co.uk/census/2011/ks204ew>

<sup>11</sup> ONS Census, 2011. Dataset : QS208EW- Religion. Available online at: <https://www.nomisweb.co.uk/census/2011/qs208ew>



**Figure 7: Religion (Ealing, London and England 2011)**



### 1.1.8 Sex

The population of Ealing is 50% male and 50% female. This is broadly in line with regional and national populations<sup>12</sup>.

### 1.1.9 Sexual orientation

Experimental data on sexual orientation is available at a regional scale<sup>13</sup>. Table 2 shows that 5% of the population of London are estimated to identify as gay, lesbian, bisexual or other.

**Table 2: Sexual orientation estimates**

	London	England
Heterosexual or straight	89%	93%
Gay or lesbian	3%	2%
Bisexual	1%	1%
Other	1%	1%
Don't know or refuse	7%	3%

### 1.1.10 Gender reassignment

Trans is a general term for people whose gender is different from the gender assigned to them at birth. For example, a trans man is someone that transitioned from woman to man.

<sup>12</sup> ONS 2020. Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

<sup>13</sup> ONS 2019. Sexual orientation UK. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/datasets/sexualidentityuk>

There is limited information about what proportion of the population is transgender, but the Government Equalities Office tentatively estimates it may be around 200,000-500,000 people nationally<sup>14</sup>.

### 1.1.11 Population, demographics and equalities summary

Table 3 summarises the key features of the population, demographics and equalities baseline and outlines considerations for the IIA and Local Plan in relation to these topics

**Table 3: Population, demographic and equality baseline summary**

Key baseline features	Considerations
Aging population	New developments should reflect the diverse character of the area.
High population density	Services should cater for ethnically and religiously diverse communities.
High working age population	Future housing need should reflect population trends.
Falling population projections	Larger than national average working age population can support economic growth.
Pockets of deprivation	Homes should be built to the London Housing Design Guide <sup>15</sup> .
Ethnically and religiously diverse populations	Deliver adaptable and accessible homes for disabled and elderly residents.
High foreign-born populations	Work in partnership with families, ethnic minorities and vulnerable groups.
Households with dependent children	

## 1.2 Housing

### 1.2.1 Housing tenure

Approximately 53% of homes in Ealing are owner-occupied, and approximately 45% of homes are rented, 27% privately and 30% socially.<sup>16</sup> (Table 4).

In terms of rental prices, the monthly average (mean) was £1484 during the 12 months to Q1 2019, which is lower than the London average of £1727 for the same time period<sup>17</sup>.

**Table 4: Housing tenure**

Ownership and tenancy type	Ealing	London
Owned: owned outright	23%	21%
Owned: owned with a mortgage or loan	28%	27%
Shared ownership (part owned and part rented)	2%	1%
Private rented: private landlord or letting agency	26%	24%
Private rented: other	1%	1%
Social rented: rented from council (Local Authority)	10%	13%
Social rented: other	8%	11%
Living rent free	2%	1%

<sup>14</sup> Government Equality Office 2020. Trans People in the UK. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721642/GEO-LGBT-factsheet.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721642/GEO-LGBT-factsheet.pdf)

<sup>15</sup> GLA 2016. Housing design. Available online at: <https://www.london.gov.uk/what-we-do/housing-and-land/improving-quality/housing-design>

<sup>16</sup> Ealing data 2019. Housing data. Available online at: <https://data.ealing.gov.uk/housing/>

<sup>17</sup> Valuation Office Agency 2019. Average Private Rents, Borough. Available online at: <https://data.london.gov.uk/dataset/average-private-rents-borough>

### 1.2.2 House prices

Over the last two decades housing affordability has worsened, largely driven by increasing house prices<sup>18</sup>. Alongside the rest of London, Ealing has a higher property price to earnings ratio than other parts of the country. In Ealing, the ratio was 14.7 in 2020 compared to 9.6 in 2010. This 2020 ratio is significantly higher than the England average of 7.8.

The average (median) price of a property in Ealing is higher than the London average. In December 2020 the average price in Ealing was £506,000, compared with £495,000 across London. This is the result of a strong upward trend over the previous decade, when the average house price in Ealing was £279,000 and £287,000 across London.

### 1.2.3 Homelessness and overcrowding

Ealing has a higher than average (median) number of those considered homeless and in priority need, with 5.2% in this category compared to the London average of 4.2%<sup>16</sup>.

Levels of overcrowding are slightly higher than the London average at 23% compared to 22%, respectively. The highest levels of overcrowding are found in Southall Green and East Acton, where 35% of households are short of at least one room<sup>19</sup>.

### 1.2.4 Housing need

It is estimated that affordable housing for 17,935 households is needed in Ealing, which would provide for the current unmet needs for affordable housing in addition to the projected future growth in affordable housing need<sup>20</sup>.

### 1.2.5 Housing summary

Table 5 summarises the key features of the housing baseline and outlines considerations for the IIA and Local Plan in relation to this topic.

**Table 5: Housing baseline summary**

Key baseline features	Considerations
High housing prices – in terms of rental accommodation and home ownership Overcrowding and homelessness	A range of homes, including affordable housing, are required throughout the borough. Deliver advice and support through the provision of suitable accommodation, training and employment. Consider adaptable housing with space for home working.

## 1.3 Economy and Employment

### 1.3.1 Employment

In Ealing 77.5% of the population is in employment, above the London average (73.8%) and the national average (74.4%). Employment rates in Ealing differ between females and males. Of the female population, 71% is in employment, broadly in line with regional and national figures, compared to 83.5% of the male population, around 6% above regional and national figures<sup>21</sup>.

<sup>18</sup> ONS 2020. Housing affordability in England Wales: 2020. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2020>

<sup>19</sup> Ealing Council 2014. [current] Ealing Housing and homelessness Strategy. Available online at: [https://www.ealing.gov.uk/downloads/download/3001/ealing\\_housing\\_and\\_homelessness\\_strategy\\_2014-19](https://www.ealing.gov.uk/downloads/download/3001/ealing_housing_and_homelessness_strategy_2014-19)

<sup>20</sup> Ealing Council 2018. [current] Ealing Strategic Housing Market Assessment. Available online at: [https://www.ealing.gov.uk/downloads/download/3015/ealing\\_strategic\\_housing\\_market\\_assessment](https://www.ealing.gov.uk/downloads/download/3015/ealing_strategic_housing_market_assessment)

<sup>21</sup> ONS 2021. Annual population survey. Available online at: <https://www.nomisweb.co.uk/>



Based on 2020 data, professional, scientific and technical industries are the largest industries within Ealing. This reflects the London and national trends<sup>22</sup> (Table 6). Other sizeable industries include construction and information and communication.

**Table 6: Percentage of businesses by Broad Industry Group**

Industry	Ealing	London	England
Agriculture, forestry & fishing	<1%	<1%	4%
Production	4%	3%	5%
Construction	14%	11%	13%
Motor trades	2%	1%	3%
Wholesale	6%	4%	4%
Retail	9%	8%	8%
Transport & Storage (inc. postal)	4%	3%	5%
Accommodation & food services	4%	5%	6%
Information & communication	13%	14%	9%
Finance & insurance	1%	3%	2%
Property	4%	5%	4%
Professional, scientific & technical	18%	23%	18%
Business administration & support services	9%	10%	9%
Public administration & defence	<1%	<1%	<1%
Education	2%	2%	2%
Health	4%	3%	4%
Arts, entertainment, recreation & other services	6%	7%	6%

The COVID-19 pandemic had an initial downward impact on national employment rates. The latest ONS report states that employment rates have continued to recover throughout 2021, to just over 1% lower than before the COVID-19 pandemic<sup>23</sup>. The COVID-19 pandemic has had different impacts across different occupations, in particular through the temporary loss of employment in certain sectors and through the increased exposure to COVID-19 experienced by those working in 'front-line' occupations<sup>24</sup>.

### 1.3.2 Employment deprivation

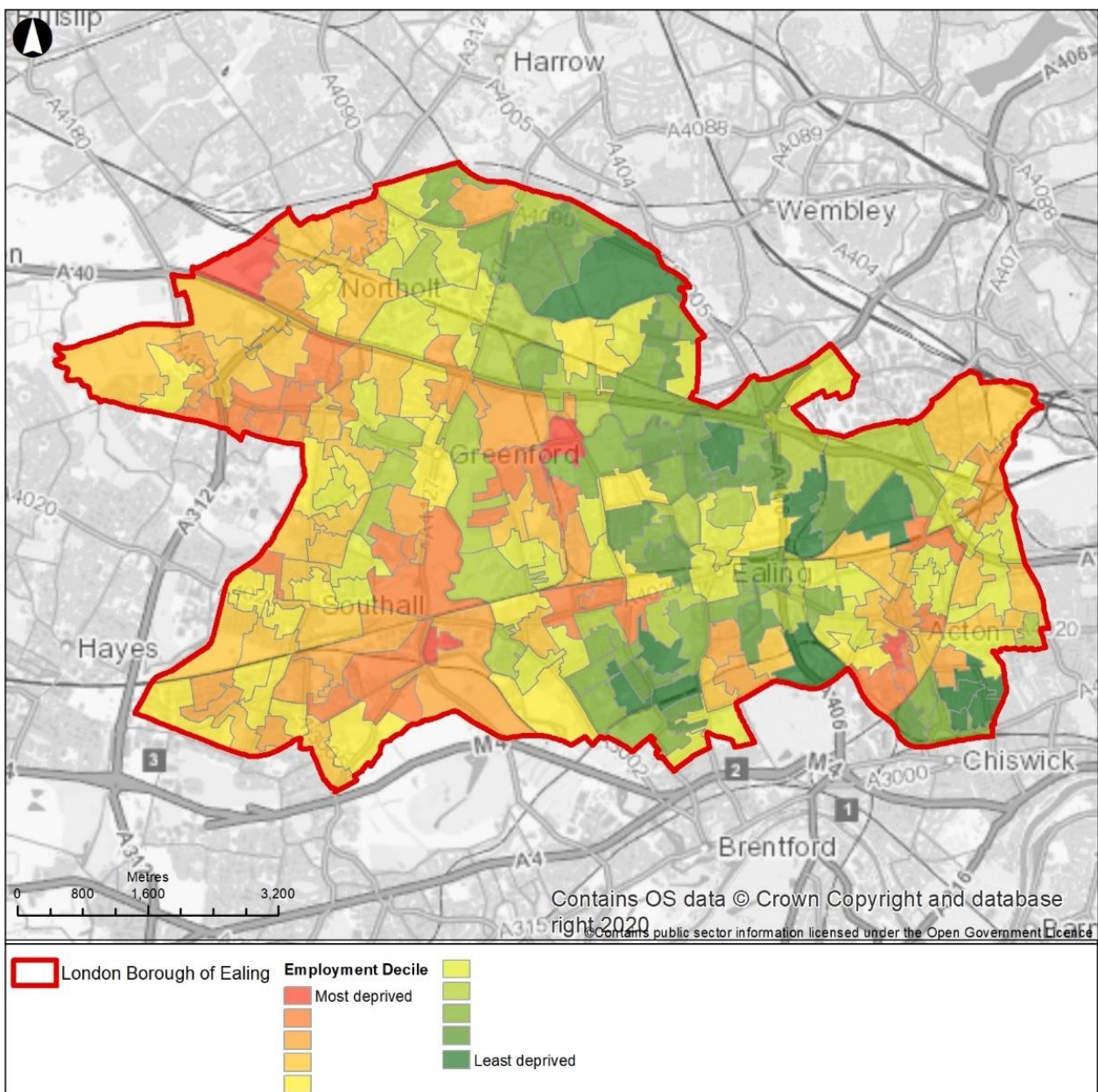
The IMD Employment domain measures the numbers of adults involuntarily excluded from the labour market. Although there is a mix of very high and very low employment deprivation, in general employment deprivation is worse in the west, and towards the eastern edge, with lower deprivation in the central zone (Figure 8).

<sup>22</sup> ONS 2020. UK business: activity, size and location. Available online at: <https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/datasets/ukbusinessactivitysizeandlocation>

<sup>23</sup> ONS 2021. Employment in the UK. Available online at: <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/employmentintheuk/latest>

<sup>24</sup> PHE 2020, Disparities in the risk and outcomes of COVID. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/908434/Disparities\\_in\\_the\\_risk\\_and\\_outcomes\\_of\\_COVID\\_August\\_2020\\_update.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf)

Figure 8: Employment deprivation in Ealing



### 1.3.3 Economic sites and businesses

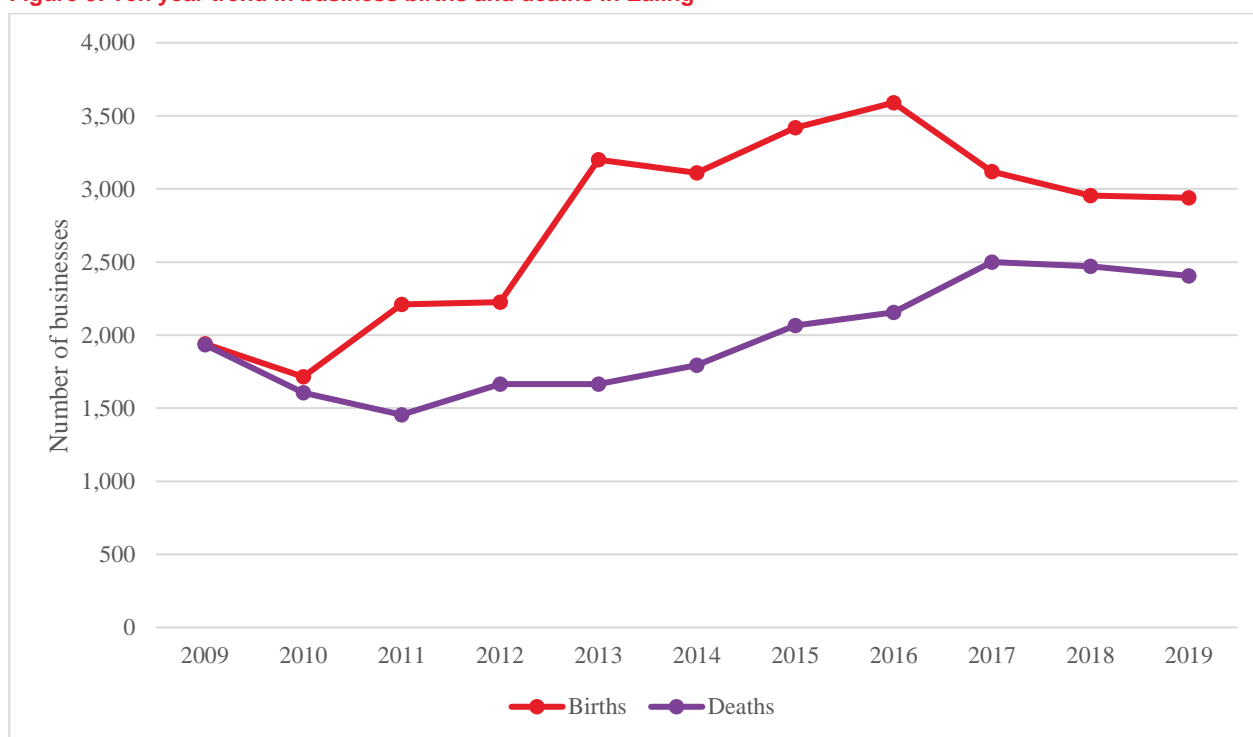
According to the 2012 State of Ealing report, Ealing is in a good economic position due in part to its location between the West End and Heathrow Airport<sup>25</sup>.

There is a hierarchy of Town Centres in London, as defined by the London Plan: International Centres, Metropolitan Centres, Major Centres and District Centres<sup>26</sup>. Ealing Town Centre is the main commercial centre and the only Metropolitan Centre designation in the borough. Southall is designated a Major Centre.

The 2010 Joint Retail Needs Study Update reported that Ealing Metropolitan Centre was performing strongly as a consequence of demand in the market and a high level of comparison goods expenditure growth, which had not been matched by any significant new floorspace being developed<sup>27</sup>. It noted that additional floorspace is needed in Ealing Town Centre and in the smaller towns of Acton, Hanwell and Greenford. It concluded that Ealing was fulfilling the role of a Metropolitan Centre, but support is needed to ensure the centre responds to competition from Westfield and Brent Cross.

Although Ealing did not see a net loss of businesses between 2009 and 2019, growth stagnated from 2013<sup>28</sup>. There has been a steady decline in the number of new businesses as well as an increase in the number of business closures under since 2016 (Figure 9 and Figure 10).

**Figure 9: Ten year trend in business births and deaths in Ealing**



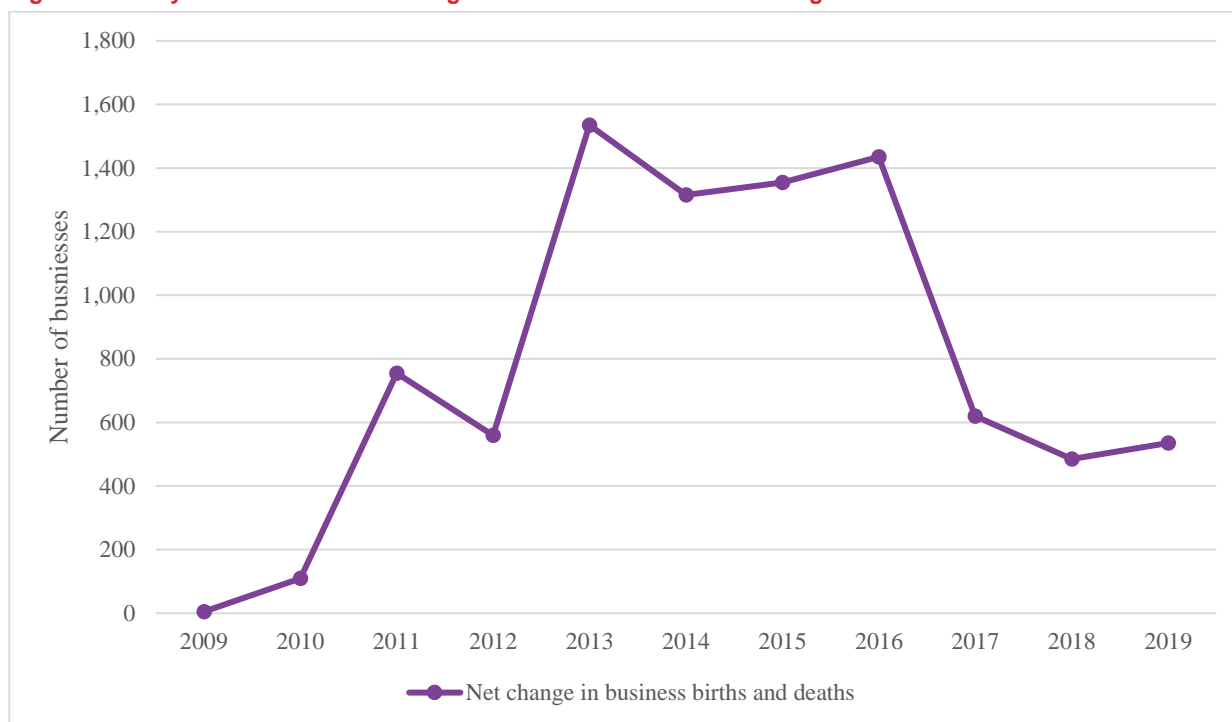
<sup>25</sup> Ealing council 2012. State of Ealing – Economy and Enterprise. Available online at: [https://www.ealing.gov.uk/downloads/download/997/state\\_of\\_ealing\\_-\\_economy\\_and\\_enterprise](https://www.ealing.gov.uk/downloads/download/997/state_of_ealing_-_economy_and_enterprise)

<sup>26</sup> Greater London Authority 2021. The London Plan 2021 – Chapter Two London's Places. Available online at: <https://www.london.gov.uk/what-we-do/planning/london-plan/past-versions-and-alterations-london-plan/london-plan-2016/london-plan-chapter-two-londons-places/policy-2>

<sup>27</sup> Ealing Council 2017. Ealing town centre retail and leisure study. Available online at: [https://www.ealing.gov.uk/downloads/download/4269/ealing\\_town\\_centre\\_retail\\_and\\_leisure\\_study](https://www.ealing.gov.uk/downloads/download/4269/ealing_town_centre_retail_and_leisure_study)

<sup>28</sup> ONS 2021. Business demographics and survival rates, boroughs. Available online at: <https://data.london.gov.uk/dataset/business-demographics-and-survival-rates-borough>

**Figure 10: Ten year trend in the net change of number of business in Ealing**



The COVID-19 pandemic has had an impact on businesses, which is not yet visible in all annually produced data sets. The ONS has indicated that nationally, business closures in 2021 are higher than the previous four years, and it is likely that this will be reflected in some way within Ealing<sup>29</sup>.

Table 6 shows the provisional Gross Value Added (GVA) contribution by broad industry group for Ealing in 2018<sup>30</sup>. The service sector which includes retail, food, financial and insurance activities, professional, scientific and technical activities, education, healthcare and the arts amongst others, contributes the most.

**Table 7: Provision GVA data by broad industry group for Ealing (2018)**

Sector type	£ (million)
Production	837
Construction	819
Services	7650
All industries	9306

Ealing contributes 2.06% towards the total GVA for London. Out of the 33 local authorities in London, the GVA of Ealing ranks 12<sup>th</sup> highest.<sup>31</sup>

<sup>29</sup> ONS 2021. Business demography, quarterly experimental statistics, UK. Available online at: <https://www.ons.gov.uk/businessindustryandtrade/business/activitysizeandlocation/datasets/businessdemographyquarterlyexperimentalstatisticsuk>

<sup>30</sup> ONS 2017. Regional economic activity by gross value added 1998 to 2017. Available online at: <https://www.ons.gov.uk/economy/grossvalueaddedgva/bulletins/regionalgrossvalueaddedbalanceduk/1998to2017/relateddata>

<sup>31</sup> ONS 2021. Regional gross value added (balanced) by industry: local authorities by NUTS1 region. Available online at: <https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/regionalgrossvalueaddedbalancedlocalauthoritiesbynuts1region>

### 1.3.4 Economy and employment summary

Table 8 summarises the key features of the economy and employment baseline and outlines considerations for the IIA and Local Plan in relation to these topics.

**Table 8: Economy and employment baseline summary**

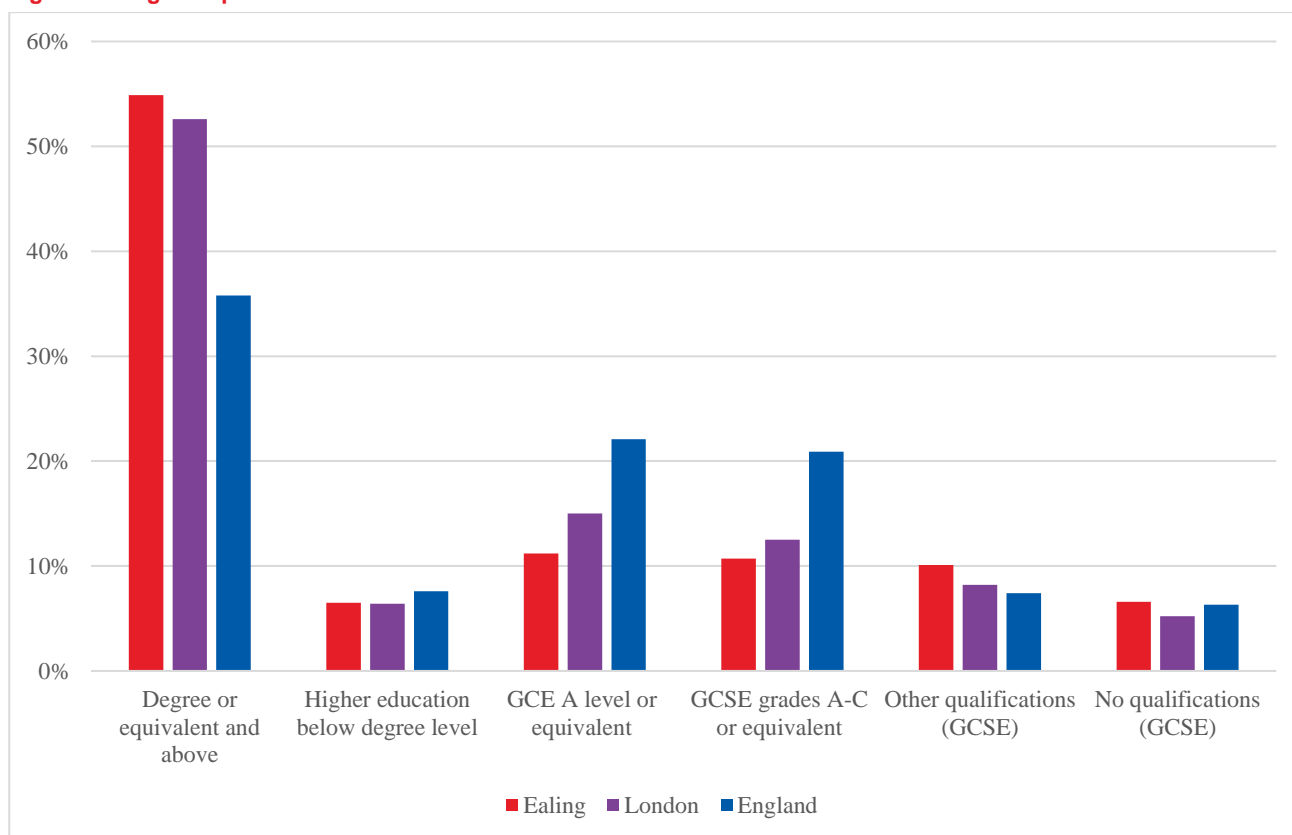
Key baseline features	Considerations
<p>Areas of employment deprivation</p> <p>Low female employment rates</p> <p>Lack of diversity in employment types</p> <p>Trend of businesses closures and lack of business 'births' in recent years</p> <p>Competition from Westfield and Brent Cross</p> <p>General impacts from COVID-19 pandemic on businesses</p>	<p>Create more mixed environments for both business and residential uses.</p> <p>Improve the economy in and around Ealing, supporting existing businesses and new start-ups.</p> <p>Promote innovation and increase competitiveness, particularly through supporting local town centres in terms of comparison and convenience floorspace.</p> <p>Support more diverse businesses, particularly those owned and used by ethnic minority groups.</p> <p>Ensure economic recovery from COVID-19 includes and supports those working in most impacted occupations</p> <p>Promote flexibility in future ways of working and progressive approaches to the workplace</p>

## 1.4 Education

### 1.4.1 Highest qualification of residents

Ealing has a higher proportion of residents who have attained qualifications at degree level or above than both the London and national averages (Figure 11). It also has a slightly higher than average proportion of residents with qualifications below GCSE grades A-C or with no qualifications<sup>32</sup>.

**Figure 11: Highest qualification of residents**

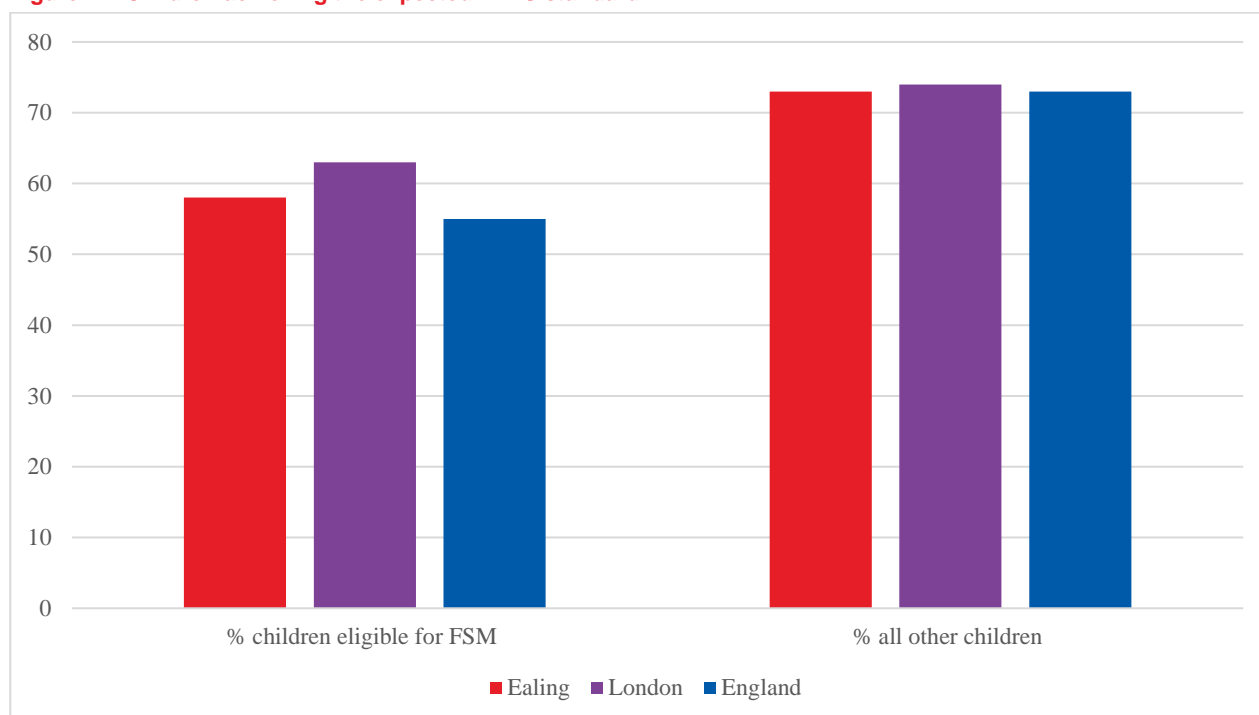


<sup>32</sup> ONS 2021. Annual population survey. Available online at: <https://www.nomisweb.co.uk/>

### 1.4.2 Pupils receiving a good standard of education.

A lower proportion of pupils eligible for free school meals (FSM) in Ealing are achieving the expected early years foundation stage (EYFS) standard than those not eligible for FSM (Figure 12). This is also reflected at London and national level, however the gap is greater in Ealing than the London average<sup>33</sup>. This gap continues throughout secondary education<sup>34</sup>.

**Figure 12: Children achieving the expected EYFS standard**



### 1.4.3 School places

There are 68 Primary and 16 Secondary schools in Ealing. There is not expected to be a significant change in demand over the next years for primary school places, whilst secondary school demand is predicted to decline slightly (Table 9)<sup>35, 36</sup>.

**Table 9: Current and project school places in Ealing**

	Current	Projected			
	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025
Primary	29,160	30,285	29,861	29,459	29,195
Secondary	21,824	18,939	19,435	19,830	19,899

### 1.4.4 Educational deprivation

The IMD Education, Skills and Training domain measures the lack of attainment and skills in the local population. Figure 13 indicates that areas within Ealing generally fall within the less deprived

<sup>33</sup> Department for Education 2020. Early Years Foundation Stage Profile. Available online at: <https://www.gov.uk/government/statistics/early-years-foundation-stage-profile-results-2018-to-2019>

<sup>34</sup> Department for Education 2020. GCSEs. Available online at: <https://www.gov.uk/government/collections/statistics-gcse-key-stage-4>

<sup>35</sup> Department for Education 2021. Schools, pupils and their characteristics. Available online at: <https://explore-education-statistics.service.gov.uk/data-tables/school-pupils-and-their-characteristics#subjectTabs-createTable>

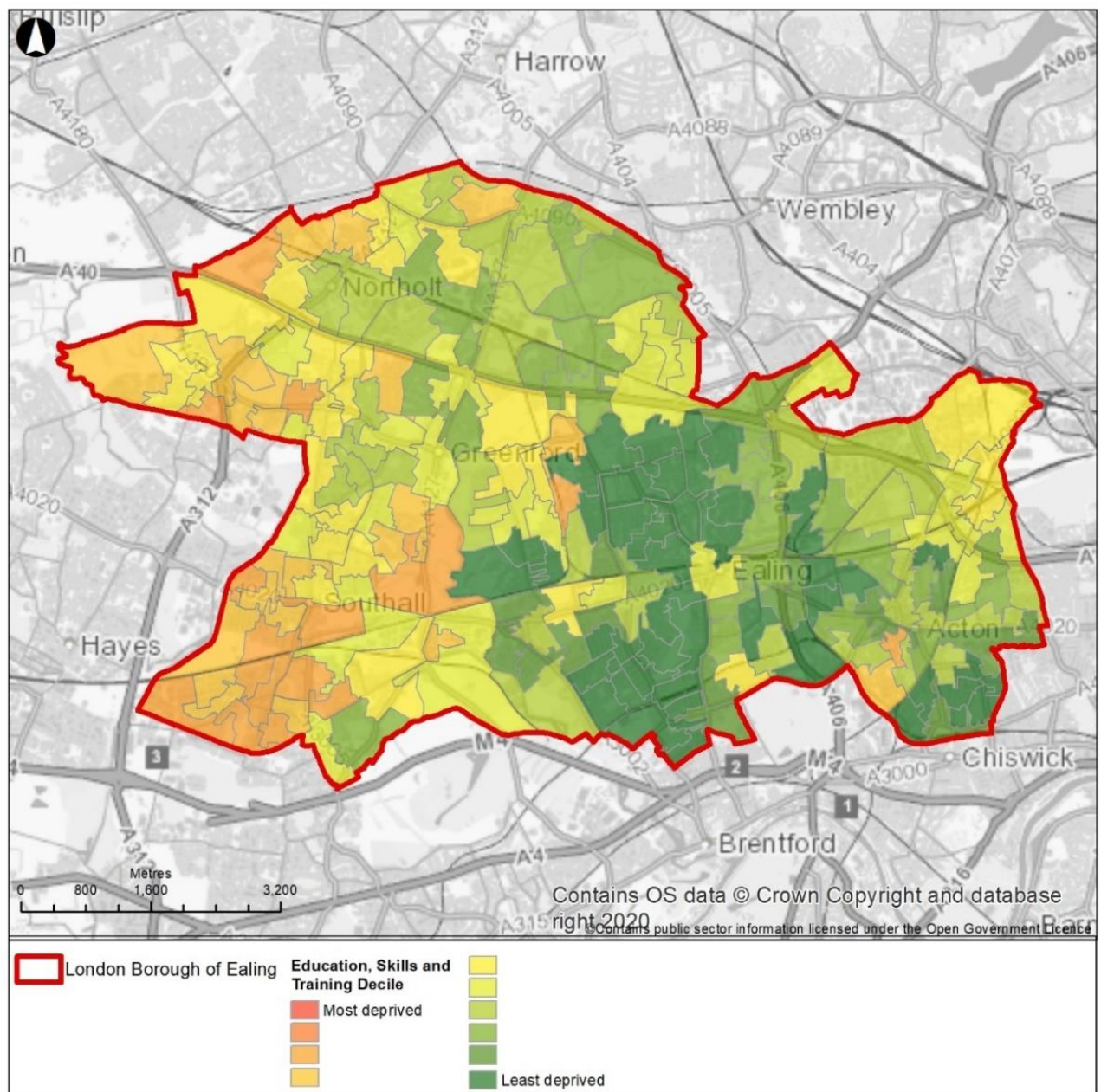
<sup>36</sup> Greater London Authority 2018. 2018 Pan-London demand projections. Available online at: <https://data.london.gov.uk/dataset/pan-london-school-place-demand>



deciles for education skills and training deprivation, although within the borough the west is clearly more deprived in terms of education<sup>37</sup>.

The COVID-19 pandemic has impacted access to education for the majority of children, however effects have been more severe in more deprived areas and both shorter and longer term increases in the attainment gap between disadvantaged and other pupils is expected<sup>38</sup>.

Figure 13: Education, skills and training deprivation



#### 1.4.5 Education summary

Table 10 summarises the key features of the education baseline and outlines considerations for the IIA and Local Plan in relation to this topic.

<sup>37</sup> ONS 2019. English indices of deprivation. Available online at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

<sup>38</sup> Parliamentary Office for Science and Technology 2020. COVID-19 and the disadvantage gap. Available online at: <https://post.parliament.uk/covid-19-and-the-disadvantage-gap/>

**Table 10: Education baseline summary**

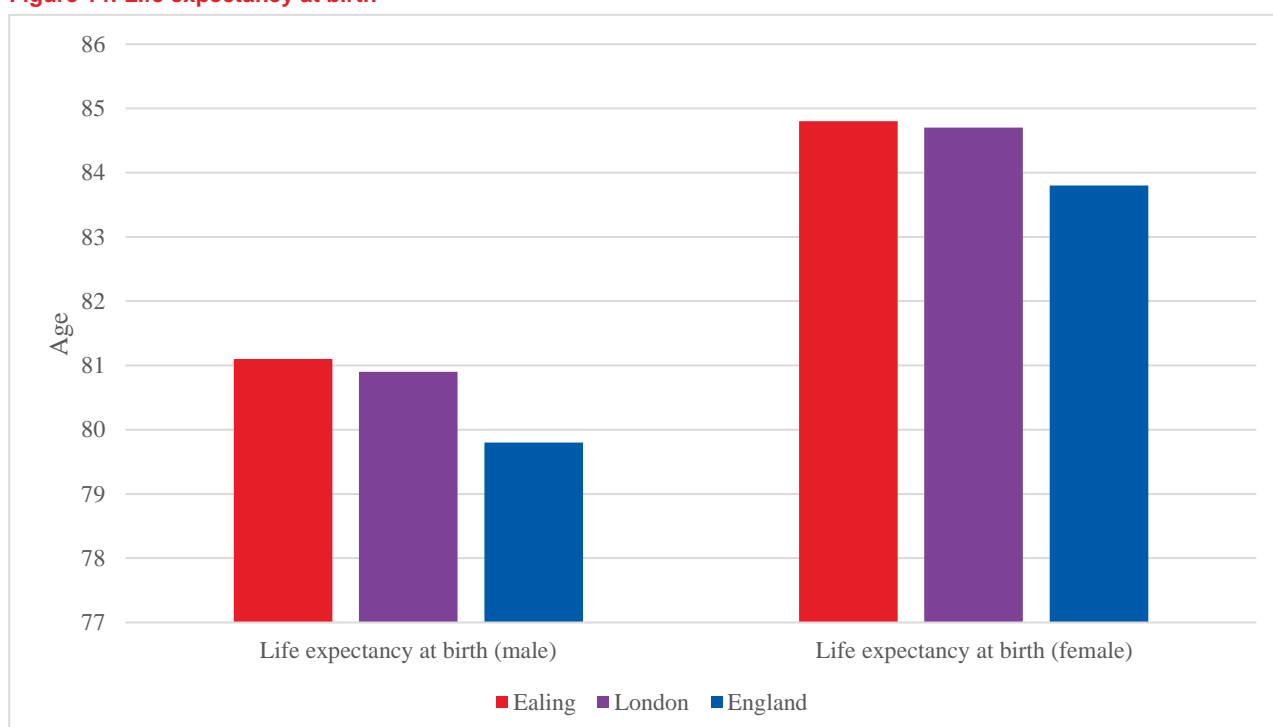
Key baseline features	Considerations
<p>Children eligible for FSM achieve poorer educational outcomes</p> <p>Higher proportion of residents without qualification at GCSE (A-C) level</p> <p>Some small pockets of educational deprivation</p>	<p>Target educational support to disadvantaged children, including to minimise any increase in the educational attainment disadvantage gap as a result of COVID-19.</p> <p>Improve access to a diverse range of educational opportunities, including continuing or adult education, vocational education and apprenticeships.</p> <p>Ensuring education and training opportunities reflect the future economic needs of Ealing.</p>

## 1.5 Health and well-being

### 1.5.1 Life expectancy

Both male and female life expectancy in Ealing is slightly higher than the regional average and approximately a year higher than the national average (Figure 14)<sup>39</sup>.

**Figure 14: Life expectancy at birth**



### 1.5.2 Disability

Table 11 shows the proportion of Ealing residents claiming two forms of disability allowance, compared with the regional and national averages<sup>40</sup>:

- Attendance Allowance (AA) is payable to those over State Pension age who are severely disabled (physically or mentally) where they need significant help with personal care or supervision.

<sup>39</sup> PHE 2021. Life expectancy at birth. Available online at: <https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/202/are/E09000009>

<sup>40</sup> DWP 2021. Attendance Allowance and Personal Independence Payments. Available online at: <https://stat-xplore.dwp.gov.uk/webapi/jsf/dataCatalogueExplorer.xhtml>



- Personal Independence Payments (PIP) are payable to those with long term physical or mental health conditions or disability.

Ealing has a lower entitled claimant rate for both payments when compared to the national average. In comparison to London, the AA claimant rate is higher for Ealing whilst the PIP rate is lower. This may be due to Ealing having a higher proportion of residents aged over 65, as AA is payable to this age group.

**Table 11: Disability allowance cases with entitlement**

	Ealing	London	England
Attendance Allowance	1.7%	1.4%	2.2%
Personal Independence Payments	2.8%	3.0%	3.9%

### 1.5.3 Pregnancy and maternity

There are no NHS maternity units in Ealing. Residents access services in neighbouring boroughs as part of a wider North-west London group which offers both consultant-led and midwife-led care across six hospital sites.

The total fertility rate (the average number of children born to a woman) in Ealing is high, at 1.95, compared with a London rate of 1.60 and national rate of 1.66<sup>41</sup>

The still-birth rate for Ealing is 4.7 per 1000 births against a regional average of 4.5 and national average of 4.0.<sup>42</sup>

### 1.5.4 General health

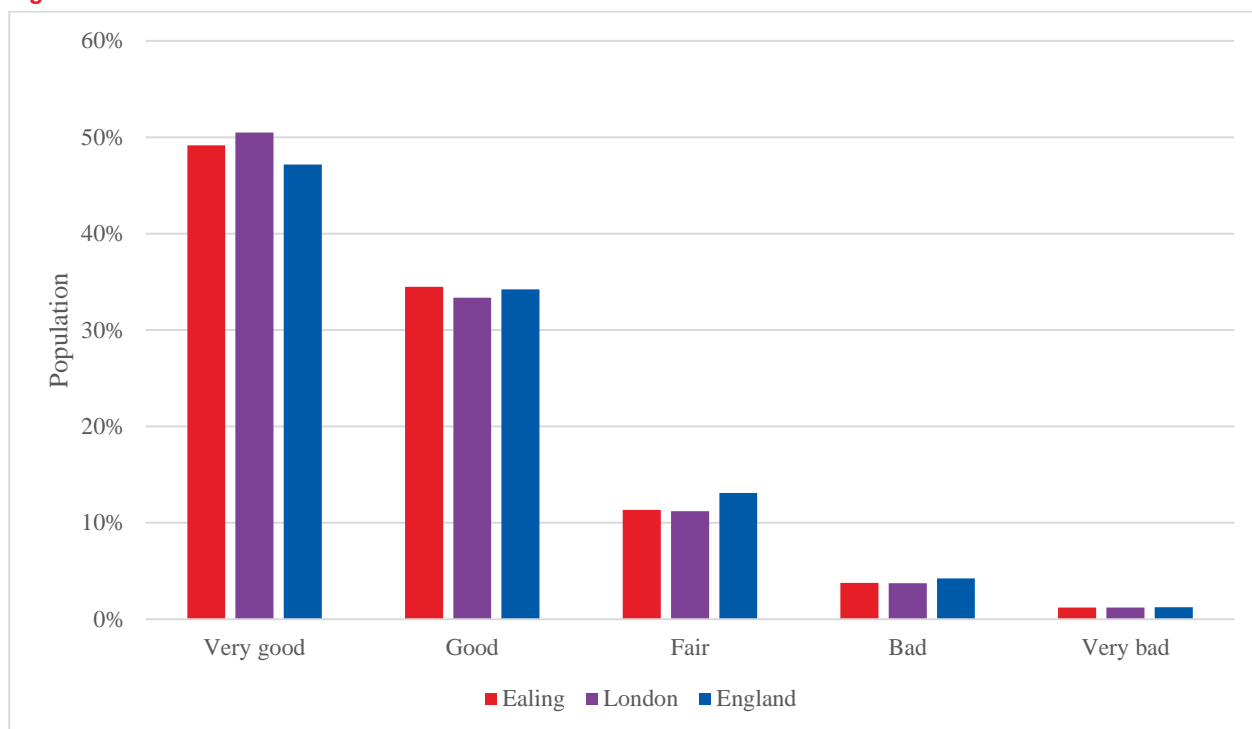
Self-assessed health ratings provide an indication of the population's general physical and mental health. Ealing residents' self-assessment of general health were generally in line with the regional average, with a slightly higher rate of reporting "very good" or "good" health than the national average<sup>43</sup> (Figure 15).

<sup>41</sup> ONS 2020. Births in England and Wales. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/datasets/birthsummarytables>

<sup>42</sup> PHE 2021. Still birth rate (2017-2019). Available online at: <https://fingertips.phe.org.uk/search/stilbirth>

<sup>43</sup> ONS Census 2011. Dataset: QS302EW - General health. Available online at: <https://www.nomisweb.co.uk/census/2011/qs302ew>

**Figure 15: General health**



### 1.5.5 Health risk factors

Significant risk factors that can decrease healthy life expectancy and increase premature deaths include smoking, alcohol misuse, low levels of physical activity and obesity<sup>44</sup>.

Ealing residents exhibit lower smoking prevalence but higher inactivity and obesity prevalence than the regional and national averages. Alcohol-specific mortality is lower among females but higher among males than the regional and national averages (Table 14).

**Table 12: Risk factors in Ealing**

Risk factor	Ealing	London	England
Smoking prevalence in adults (18+) – current smokers	10%	13%	14%
Alcohol-specific mortality – male (per 100,000)	19%	12%	15%
Alcohol-specific mortality – female (per 100,000)	3%	4%	7%
Physically inactive adults	28%	25%	23%
Prevalence of overweight and obesity: Year 6	38%	38%	35%

The estimated prevalence of common mental disorders within the population served by the NHS Ealing Care Commissioning Group (CCG) is 19.2%<sup>45</sup>. Nationally, evidence indicates that the

<sup>44</sup> PHE 2021. Public Health Outcomes Framework. Available online at: <https://fingertips.phe.org.uk/public-health-outcomes-framework#gid/1000042/ati/6>

<sup>45</sup> PHE 2017. Common Mental Health Disorders. Available online at: <https://fingertips.phe.org.uk/profile-group/mental-health/profile/common-mental-disorders/data#page/0>

COVID-19 pandemic has had at least a short-term negative impact on the prevalence of mental ill health and on the rate of access to relevant services<sup>46</sup>.

### 1.5.6 Other health determinants

Health determinants are non-medical factors that influence health outcomes, including employment, education, housing and social inclusion. In Ealing, 13% of households are considered fuel poor<sup>47</sup> and 18% of children were living in low-income families in 2020, up from 14% in 2015<sup>48</sup>.

The local environment, including air quality and noise levels, can also influence health outcomes. Ealing has high particulate pollution in line with London. Additionally, there is a 6.4% fraction of mortality attributable to particulate air pollution<sup>49</sup>.

Other health determinants are described throughout this baseline including housing (Section 1.2), income and employment (Section 1.3), education (Section 1.4) and air quality and noise (Section 1.7). The COVID-19 pandemic is anticipated to have negatively impacted a number of these wider determinants of health<sup>50</sup>, exacerbating the health inequalities outlined in the next section.

### 1.5.7 Health deprivation

The IMD Health deprivation and disability domain measures the risk of premature death and the impairment of quality of life through ill health or disability. Figure 16 indicates that areas within Ealing generally fall within the less deprived deciles for health deprivation and disability, although there are scattered pockets within the borough of significantly higher health deprivation<sup>51</sup>.

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<sup>46</sup> PHE 2020. COVID-19 mental health and well-being surveillance: report. Available online at: <https://www.gov.uk/government/publications/covid-19-mental-health-and-well-being-surveillance-report>

<sup>47</sup> Department for Business, Energy & Industrial Strategy 2019. Sub-regional fuel poverty data. Available online at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021>

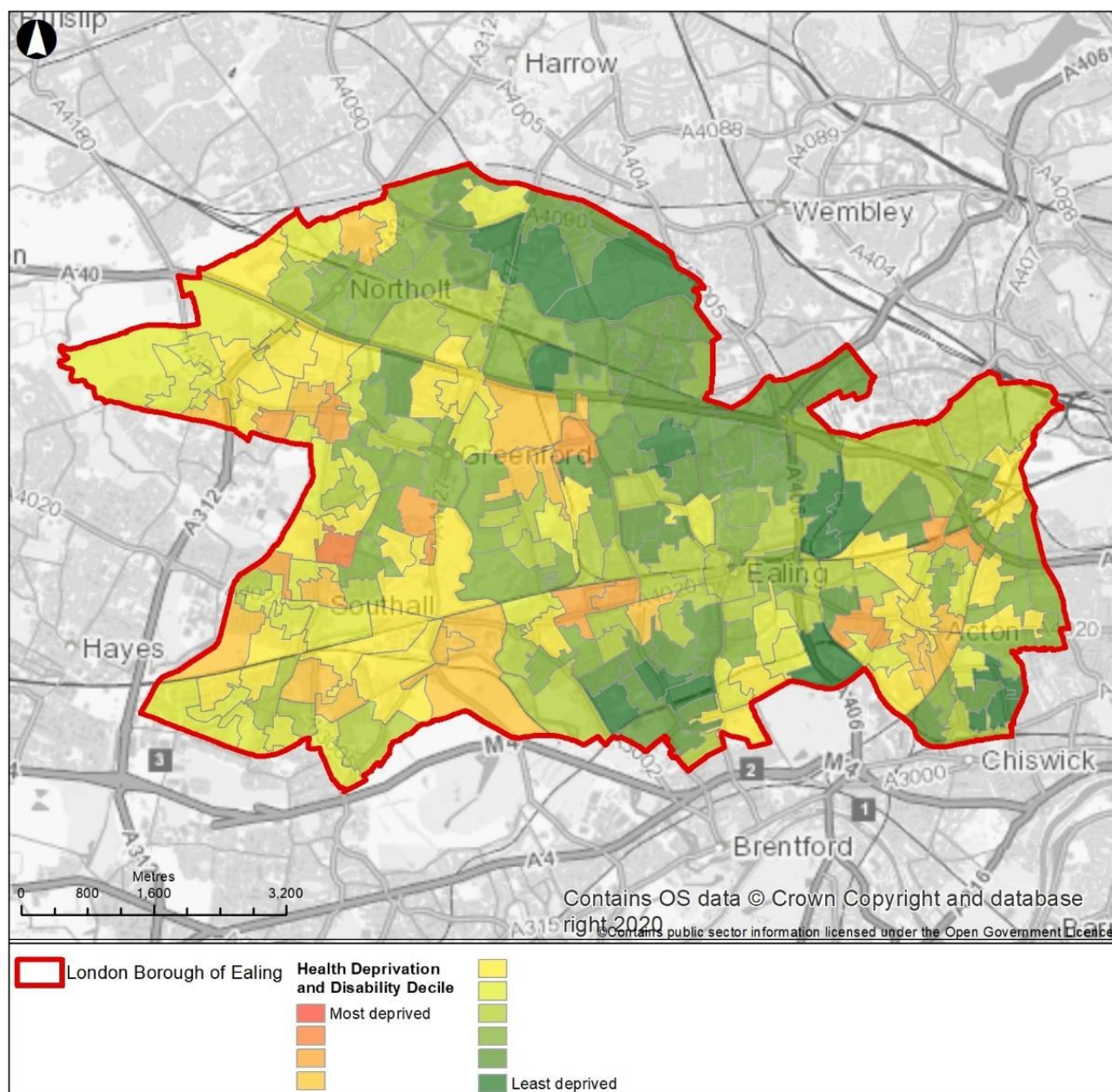
<sup>48</sup> DWP 2021. Children in relative low income families. Available online at: <https://www.gov.uk/government/statistics/children-in-low-income-families-local-area-statistics-2014-to-2020>

<sup>49</sup> PHE 2017. Public Health Outcomes Framework. Available online at: <https://fingertips.phe.org.uk/-/profile/-/public-health-outcomes-framework-/data>

<sup>50</sup> PHE 2020. Disparities in the risk and outcomes of COVID. Available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/908434/Disparities\\_in\\_the\\_risk\\_and\\_outcomes\\_of\\_COVID\\_August\\_2020\\_update.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/908434/Disparities_in_the_risk_and_outcomes_of_COVID_August_2020_update.pdf)

<sup>51</sup> ONS 2019. English indices of deprivation. Available online at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

Figure 16: Health and disability deprivation in Ealing



### 1.5.8 Health and well-being summary

Table 13 summarises the key features of the health and well-being baseline and outlines considerations for the IIA and Local Plan in relation to these topics.

Table 13: Health issue and opportunities

Key considerations	Opportunities
Life expectancy inequality Low physical activity levels in adults High childhood obesity rates High rates within poverty related risk factors including fuel poverty and low income families. Small pockets of health deprivation	Targeting health interventions to reduce health inequalities, including those exacerbated by the COVID-19 pandemic. Supporting healthy lifestyles through improving physical activity levels, access to green spaces and access to healthy food. Ensuring access to healthcare services, including mental health services, that match the specific needs of the population of Ealing. Adaptability to major health events and extreme climate events. Develop services that reflect interdependencies between health and economic trends.



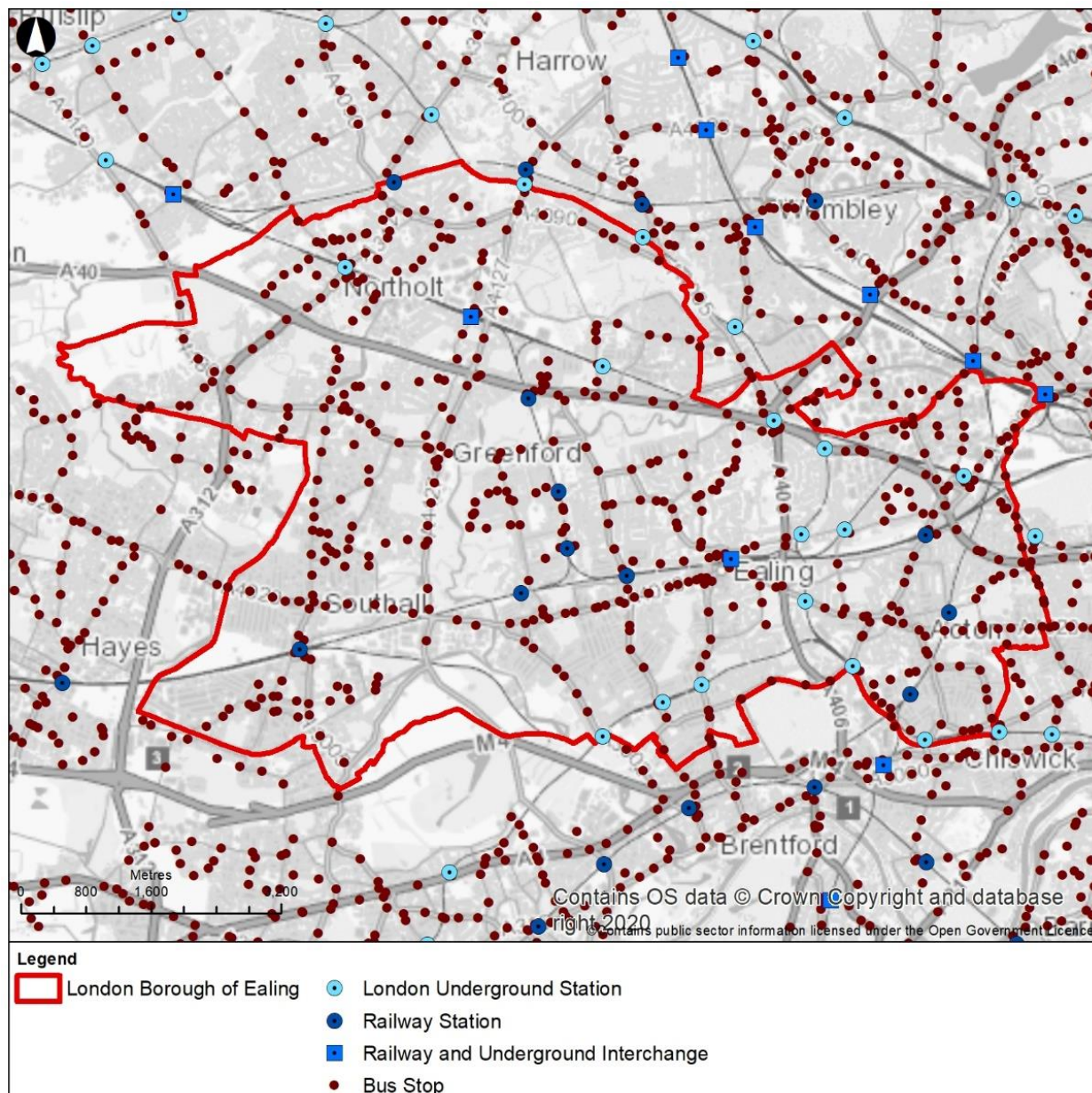
## 1.6 Transport and connectivity

### 1.6.1 Transport network

Ealing has substantial public transport provision, which is characteristic of its location within a major city (Figure 17). The main transport hub for trains, London Underground and buses is Ealing Central. A key transport feature of Ealing is the Great Western Main Line, which traverses through the centre of the borough.

The borough is also well-connected by major roads, including the North Circular (A406), the A40 and Uxbridge Road.

Figure 17: Public transport network

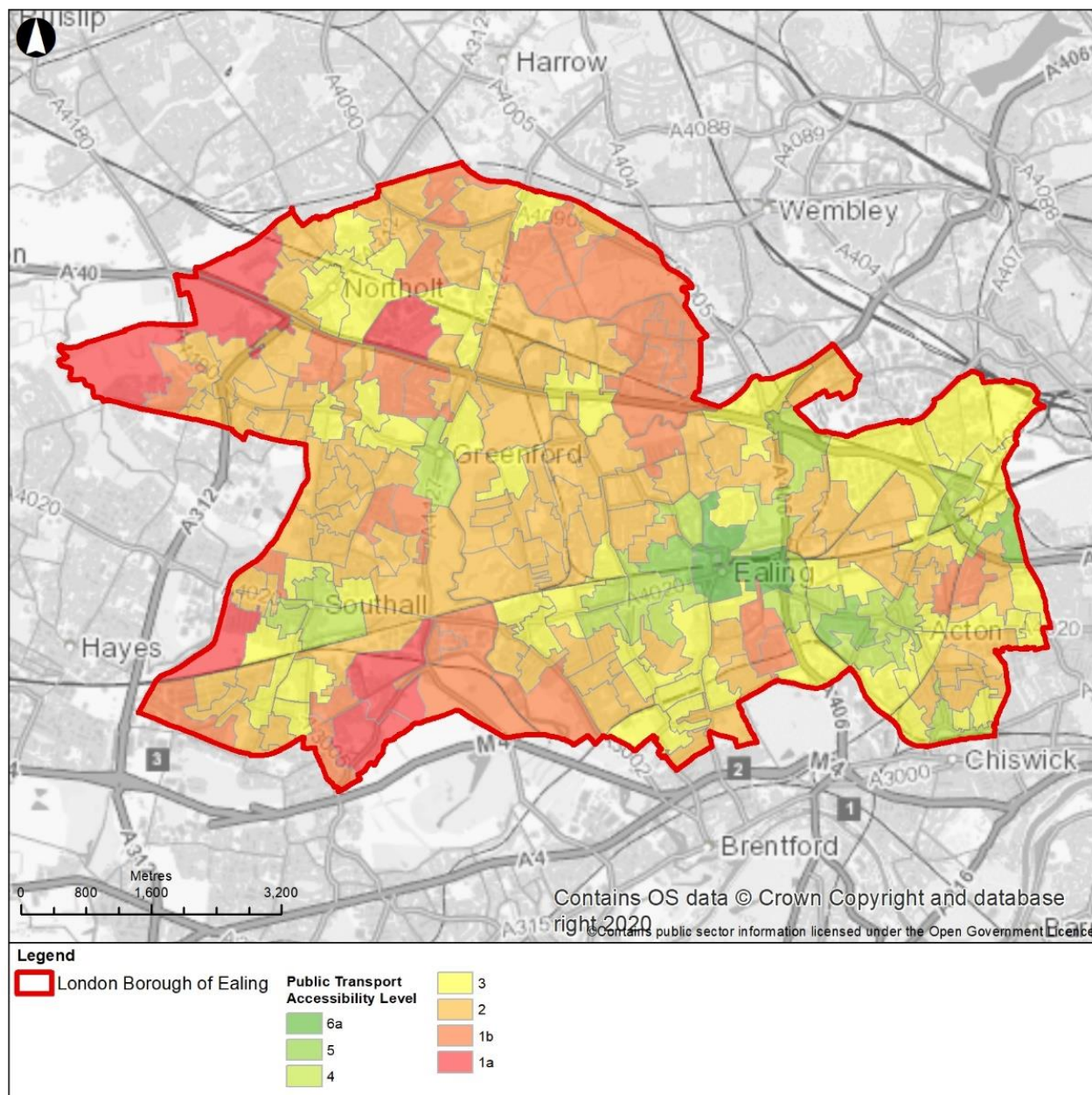


### 1.6.2 Public Transport Access Levels

Public Transport Access Levels (PTAL) is a measure of accessibility to the public transport network in London, taking into account walking times and service availability. Each area is graded between 0 and 6b, where a score of 0 is very poor access and 6b is excellent access to public transport.

PTAL varies substantially across the borough (Figure 18)<sup>52</sup>. Good accessibility is located in Ealing town centre and Ealing Broadway, and to a lesser extent around the other borough town centres and along main roads. PTAL tends to be lower towards northern, southern and western edges of the borough.

**Figure 18: PTAL in Ealing**



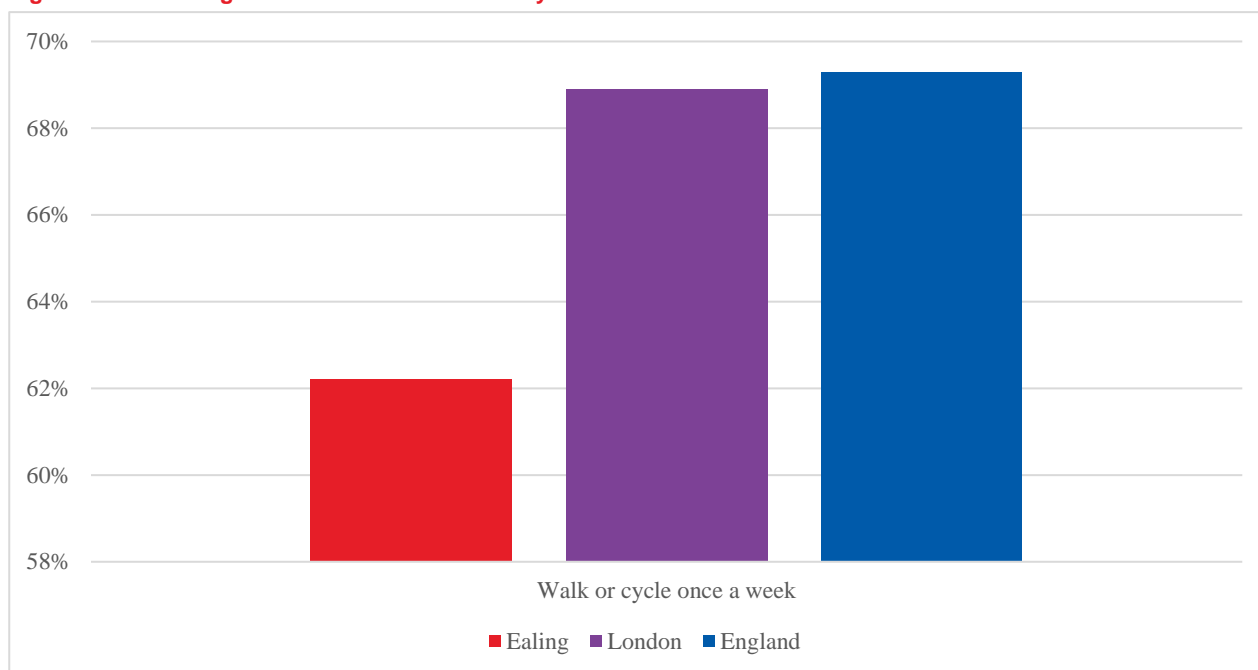
<sup>52</sup> TfL 2015. Public Transport Accessibility Levels. Available online at: <https://data.london.gov.uk/dataset/public-transport-accessibility-levels>



### 1.6.3 Active travel

Figure 19 shows that the proportion of Ealing residents who do any walking or cycling once a week is lower than regional and national averages<sup>53</sup>.

**Figure 19: Percentage of residents who walk or cycle once a week**



Transport for London's most recent 'Travel in London' report suggests that the COVID-19 pandemic has had at least a short-term impact on travel trends, significantly increasing the number of journeys made on foot or bicycle<sup>54</sup>. As workers who have been working from home partially return to offices, this increase is also likely to be reflected in their travel to work modes, at least in the short term. An overall gradual upwards trend in active travel was already evident before the pandemic and so is likely to continue in the long-term<sup>55</sup>.

### 1.6.4 Travel to work

In line with all areas of London, public transport usage is much higher than the national average in Ealing (Figure 20)<sup>56</sup>. Noticeable variations from the London average include higher car usage. This is reflective of the geography of Ealing as an outer borough, and the distribution of mainline train routes within London. Use of active travel modes to work (cycling and walking) are lower than both the regional and national averages.

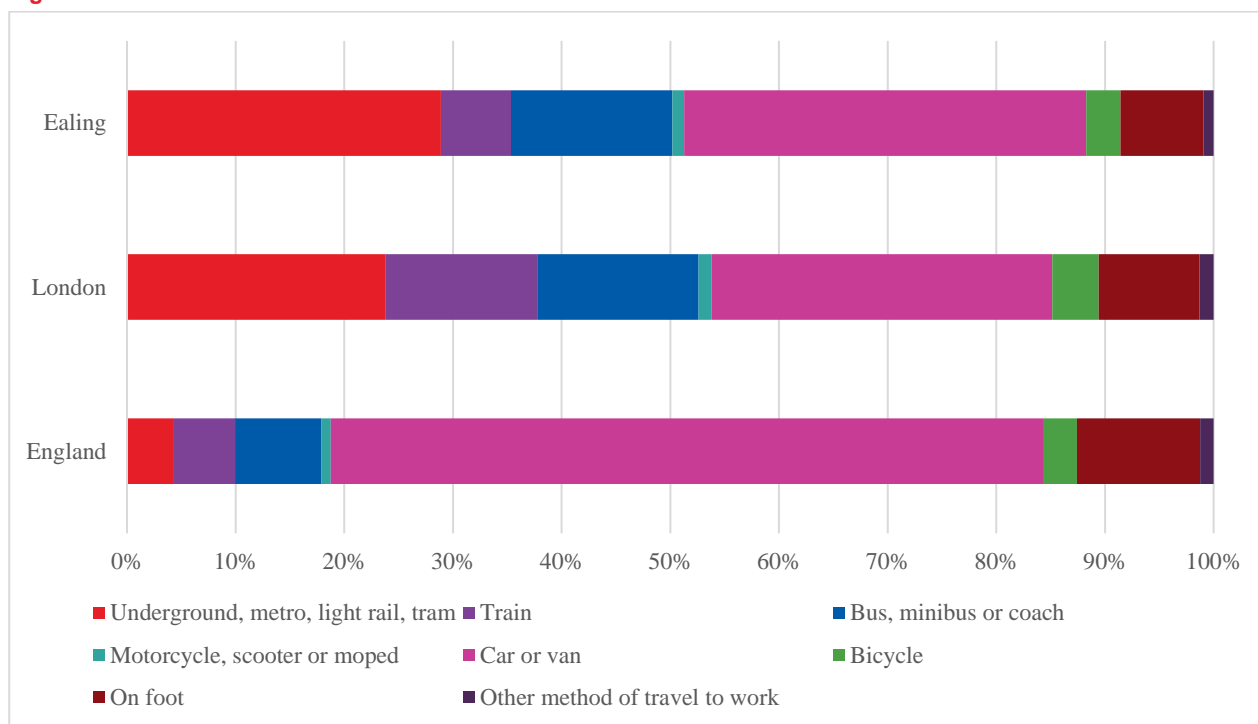
<sup>53</sup> DfT 2021. CW0301: Proportion of adults who do any walking or cycling, for any purpose, by frequency and local authority: England. Available online at: <https://www.gov.uk/government/statistical-data-sets/walking-and-cycling-statistics-cw>

<sup>54</sup> TfL 2020. New TfL data shows significant increase in walking and cycling since the pandemic started. Available online at: <https://tfl.gov.uk/info-for/media/press-releases/2020/december/new-tfl-data-shows-significant-increase-in-walking-and-cycling-since-the-pandemic-started>

<sup>55</sup> TfL 2020. Travel in London Report 13. Available online at: <https://content.tfl.gov.uk/travel-in-london-report-13.pdf>

<sup>56</sup> ONS Census 2011. Dataset: QS701EW- Method of travel to work. Available online at: <https://www.nomisweb.co.uk/census/2011/qs701ew>

**Figure 20: Travel to work**



### 1.6.5 Safety

There were 983 road accidents in Ealing in 2019, a broadly steady accident rate when compared with figures for the previous five years<sup>57</sup>.

### 1.6.6 Transport and connectivity summary

Table 14 summarises the key features of the transport and connectivity baseline and outlines considerations for the IIA and Local Plan in relation to these topics.

**Table 14: Transport and connectivity baseline summary**

Key baseline features	Considerations
Variable transport connectivity Lower than average active travel mode usage Changes in transport patterns as a result of the COVID-19 pandemic Severance by major transport infrastructure routes	Increasing opportunities for active travel. Leveraging new development to increase equitable distribution of transport connectivity. Potential for great connectivity associated with future transport schemes, including HS2 and the Elizabeth Line. Reducing private vehicle use. Reducing severance associated with major linear transport infrastructure within the borough.

<sup>57</sup> DfT 2021. Accidents by country, English region, local authority and road class. Available online at: <https://www.gov.uk/government/statistical-data-sets/reported-road-accidents-vehicles-and-casualties-tables-for-great-britain>



## 1.7 Air and noise pollution

### 1.7.1 Air quality

Air Quality Management Areas (AQMAs) are areas which have been declared due to monitored or modelled exceedances of the national air quality objectives and are designated by a local authority. Air Quality Focus Areas (AQFAs) are areas where there is significant human exposure to NO<sub>2</sub> pollution in excess of safe limits.

Ealing is subject to a borough-wide AQMA and also has eight AQFAs, located predominantly along major roads in the borough (Figure 21).

**Figure 21: Air Quality Focus Areas**

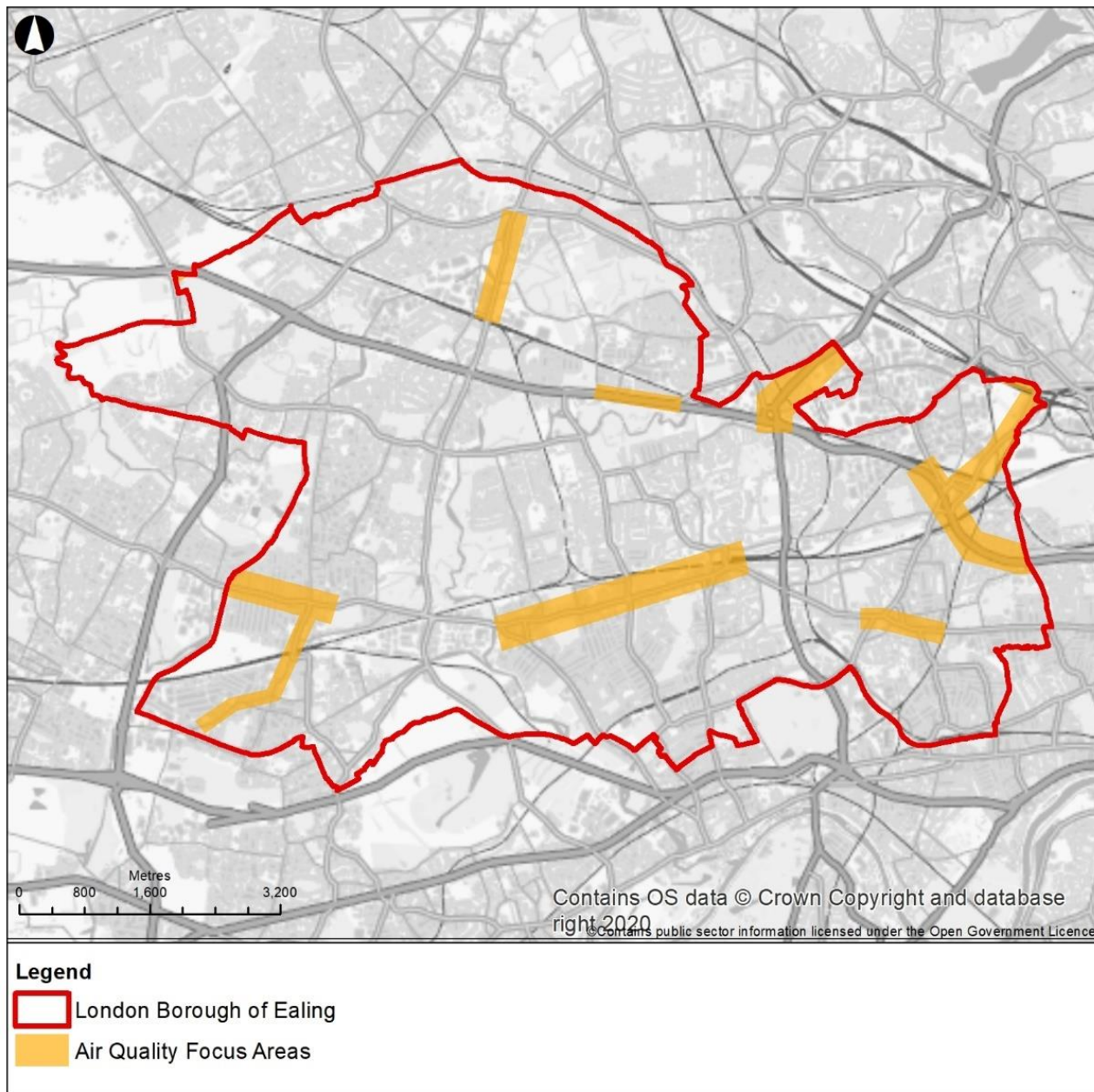


Figure 22 outlines particulate pollution levels and the level of mortality attributable to particulate air pollution<sup>58</sup>. In line with the rest of London, Ealing has both a higher level of fine particulate matter and higher fraction of attributable mortality to particulate pollution than the national average.

**Figure 22: Fine particulate matter and fraction of attributable mortality to particulate pollution**

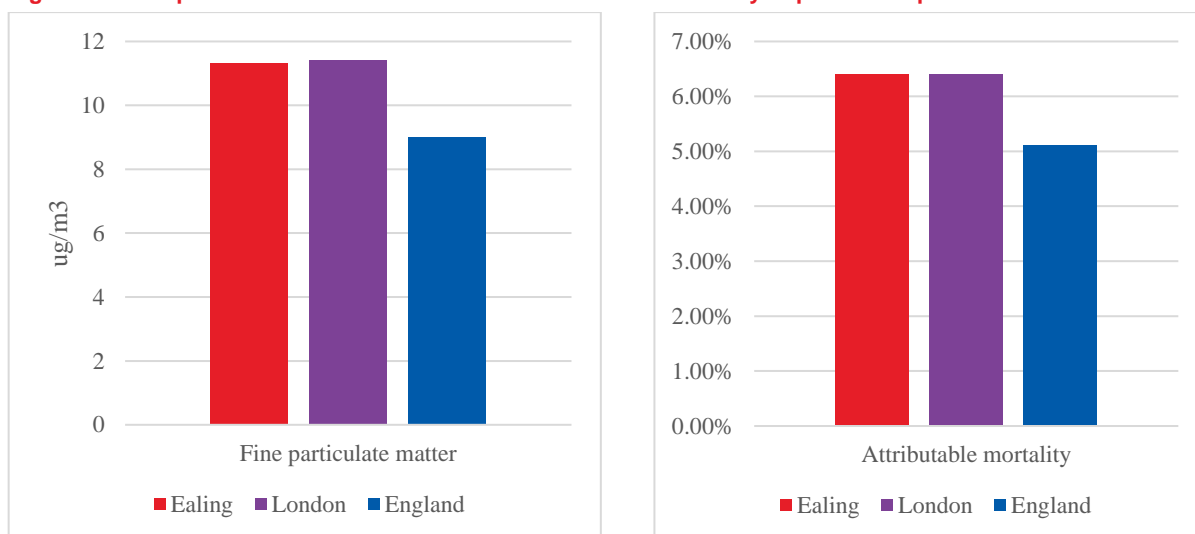


Table 15 shows the daily average NO<sub>2</sub> and PM<sub>10</sub> levels at four air quality monitoring sites in Ealing. Figures in red exceed the safe levels for the annual mean<sup>59</sup>.

**Table 15: Transport issues and opportunities**

Location	Type of site	NO <sub>2</sub> annual mean (ug/m3)				PM <sub>10</sub> annual mean (ug/m3)			
		2018	2019	2020	2021	2018	2019	2020	2021
Acton Vale	Urban background	30	26	19	19	17	18	16	18
Hangar Lane Gyratory	Roadside	68	65	51	49	28	25	22	19
Horn Lane	Industrial	44	42	33	31	25	28	24	27
Western Avenue	Roadside	53	49	35	33	28	25	22	24

The main source of air pollution that originates within the borough is NO<sub>x</sub> emissions from road transport and domestic and commercial gas sources (boilers)<sup>60,61</sup>.

### 1.7.2 Noise

In Ealing 9.5% of residents were estimated to be exposed to high (65dB) levels of transport noise during the day, lower than the London estimate of 12.1% but higher than the national estimate of 5.5%<sup>62</sup>.

<sup>58</sup> PHE 2017. Public Health Outcomes Framework. Available online at: <https://fingertips.phe.org.uk/-/profile/public-health-outcomes-framework/-/data>

<sup>59</sup> Air Standards Regulations 2010. Available online at: <https://www.legislation.gov.uk/uksi/2010/1001/contents/made>

<sup>60</sup> Ealing Council 2017. Air Quality Action Plan 2017-2022. Available online at: <https://ealingair.org.uk/AirQuality/Reports.aspx>

<sup>61</sup> Ealing Council 2020. 2020 Air Quality Status Report for London Borough of Ealing. Available online at <https://ealingair.org.uk/AirQuality/Reports.aspx>

<sup>62</sup> PHE 2021. The percentage of the population exposed to road, rail and air transport noise. Available online at: <https://fingertips.phe.org.uk/search/noise>

Additionally, 12.5% of Ealing residents were estimated to be exposed to high (55dB) levels of transport noise at night. This is lower than for London (15.9%) but higher than national levels (8.5%).

### 1.7.3 Air quality and noise summary

Table 14 summarises the key features of the air quality and noise baseline and outlines considerations for the IIA and Local Plan in relation to these topics.

**Table 16: Air quality and noise baseline summary**

Key baseline features	Considerations
Potentially unsafe areas of NO <sub>2</sub> pollution High fraction of mortality attributable to particulate pollution Relatively high levels of transport noise exposure	Ensure new development minimises exposure to poor air quality and noise pollution. Securing Air Quality Neutral Developments. Ensuring that emissions from construction are minimised. Reduce transport pollution. Encourage lasting improvements to air quality. Implementing the Agent of Change Principle.

## 1.8 Material assets and land use

### 1.8.1 Geology

Ealing forms part of the London Clay Basin, the main feature of which is the alluvial flood plain of the River Thames, which has three “terraces” of river gravels and brickearth clays<sup>63</sup>. With regards to geology and soils the borough can be divided into three areas<sup>64,65</sup>:

- [1] North: London Clay bedrock, overlain by alluvium and flood plain gravels. The soils are loamy and clayey, seasonally wet with impeded drainage.
- [2] South-west: London Clay bedrock with areas of Woolwich and Reading Clay, sand beds and Upper Chalk, which is classified as a principle aquifer. This is overlain with flood plain gravel and Taplow (river terrace) gravel. The soils are loamy with areas that are naturally wet with a high water table.
- [3] South-east: predominantly the same as the south-west. The Taplow Gravel is classified as a Secondary A aquifer. The soils are a mixture of loamy and sandy.

Regionally Important Geological Sites (RIGS) are a non-statutory designation for areas of geological or geomorphological importance. Horsenden Hill is designated a RIGS for its diversity of rocks, fossils, minerals, landforms and soils.

### 1.8.2 Land Use

Brownfield sites refer to any previously developed land. The majority of brownfield sites in Ealing are located along the A4020 corridor and in Southall and Ealing Broadway<sup>66</sup>.

<sup>63</sup> Ealing Council 2006. Contaminated land strategy. Available online at: [https://www.ealing.gov.uk/downloads/download/468/contaminated\\_land\\_strategy](https://www.ealing.gov.uk/downloads/download/468/contaminated_land_strategy)

<sup>64</sup> British Geological Survey 2021. Geology of Britain viewer. Available online at: <https://mapapps.bgs.ac.uk/geologyofbritain/home.html>

<sup>65</sup> Cranfield Soil and Agrifood Institute 2021. Soilscales. Available online at: <http://www.landis.org.uk/soilscales/>

<sup>66</sup> Ealing Council 2018. Brownfield Land Register. Available online at: [https://maps.ealing.gov.uk/map/Aurora.svc/run?script=Aurora\brownfield\\_land\\_register.AuroraScript&nocache=504339599&resize=always&margin\\_bottom=1](https://maps.ealing.gov.uk/map/Aurora.svc/run?script=Aurora\brownfield_land_register.AuroraScript&nocache=504339599&resize=always&margin_bottom=1)

Opportunity Areas are London's major source of brownfield land, designated in the London Plan as areas with significant capacity for new housing, commercial and other development<sup>67</sup>. Old Oak and Park Royal is one Opportunity Area in Ealing, which as mentioned above, is now overseen by the OPDC. Southall is the other Opportunity Area.

Strategic Industrial Locations (SIL) are designated in the London Plan as areas which provide the largest concentrations of industrial, logistic and other related capacity to support the London economy. In Ealing, the areas designated as SIL are Great Western and Northolt, Greenford, Perivale. Park Royal is also designated as SIL which, as described above, is overseen by the OPDC<sup>68</sup>.

Green belt is a policy and land-use designation designed to retain areas of largely undeveloped, wild or agricultural land between built-up areas. There are several Green Belt areas in the western half of the borough (occupying 6% of the land area of the borough), including Yeading Brook, Shooting Grounds, Lime Tree Park, Prior Field, Islip Manor, Northala Fields and Spikesbridge<sup>69</sup>. There are also a large number of MOL sites in the borough occupying 16% of the land area.

### 1.8.3 Waste and recycling

Total waste volumes in Ealing have been falling in recent years, driven predominantly by a reduction in household waste (Figure 25)<sup>70</sup>.

Per capita average household waste is also lower in Ealing than the regional and national averages (Figure 25)<sup>71, 72</sup>.

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<sup>67</sup> Greater London Authority 2021. Opportunity Areas Map. Available online at: <https://www.london.gov.uk/what-we-do/better-infrastructure/infrastructure-coordination/planning-service/opportunity-areas/opportunity-areas-1>

<sup>68</sup> Greater London Authority 2021. The London Plan 2021. Available online at: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

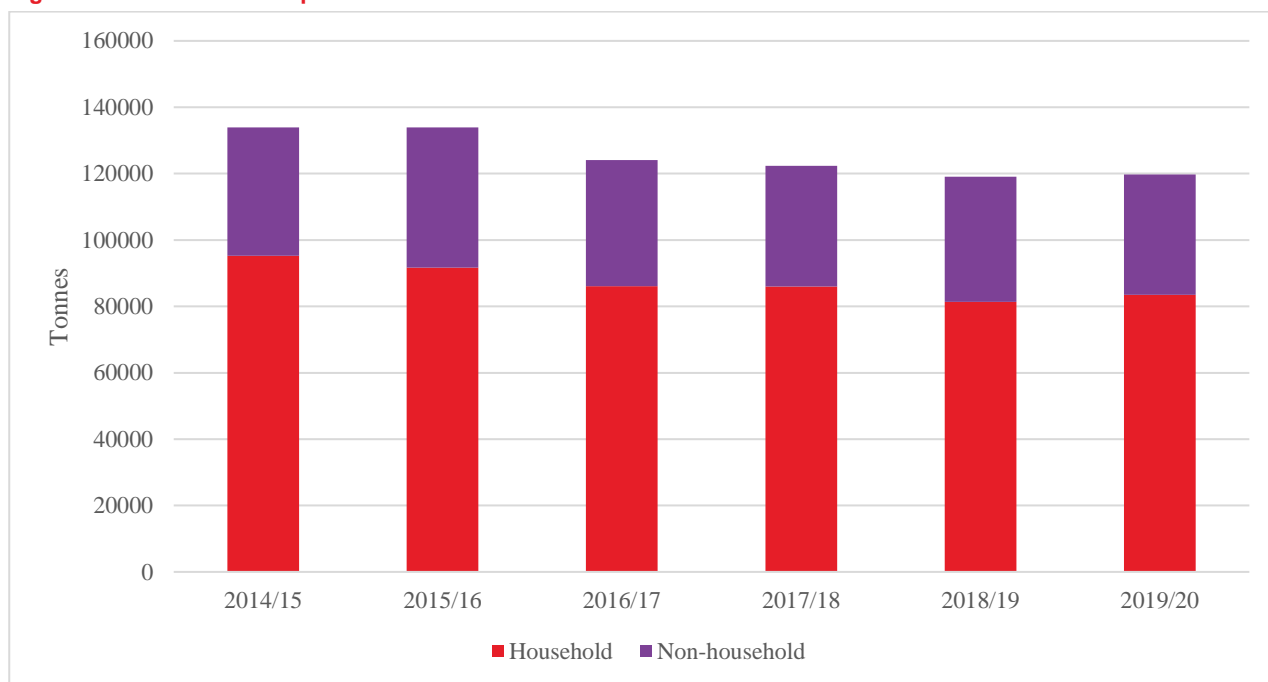
<sup>69</sup> Ealing Council 2013. [Current] Local Plan – Green Belt and Metropolitan Open Land. Available online at: [https://www.ealing.gov.uk/download/downloads/id/1350/102\\_green\\_belt\\_and\\_metropolitan\\_open\\_land.pdf](https://www.ealing.gov.uk/download/downloads/id/1350/102_green_belt_and_metropolitan_open_land.pdf)

<sup>70</sup> Department for Environment, Food & Rural Affairs 2021. Local authority collected waste. Available online at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables>

<sup>71</sup> Ibid.

<sup>72</sup> ONS 2018. Population projections for local authorities. Available online at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

**Figure 23: Total waste composition**



**Figure 24: Household waste**



Ealing achieved a recycling rate of 48% in 2019/20 (Figure 25), above both London and national averages, an increase from 38% in 2009/10 (Figure 28)<sup>73</sup>. Ealing has set a recycling rate target of 60% by 2022<sup>74</sup>. There are two waste reuse and recycling centres in the borough, in Greenford and Acton<sup>75</sup>.

<sup>73</sup> Department for Environment, Food & Rural Affairs 2021. House waste recycling rates, borough. Available online at: <https://data.london.gov.uk/dataset/household-waste-recycling-rates-borough>

<sup>74</sup> Ealing 2021. Recycling services. Available online at: [https://www.ealing.gov.uk/info/201171/recycling\\_services](https://www.ealing.gov.uk/info/201171/recycling_services)

<sup>75</sup> Ealing 2021. Reuse and recycling centres. Available online at: [https://www.ealing.gov.uk/info/201171/recycling\\_services/292/re-use\\_and\\_recycling\\_centres\\_and\\_sites/1](https://www.ealing.gov.uk/info/201171/recycling_services/292/re-use_and_recycling_centres_and_sites/1)

Figure 25: Recycling rates in 2019/20

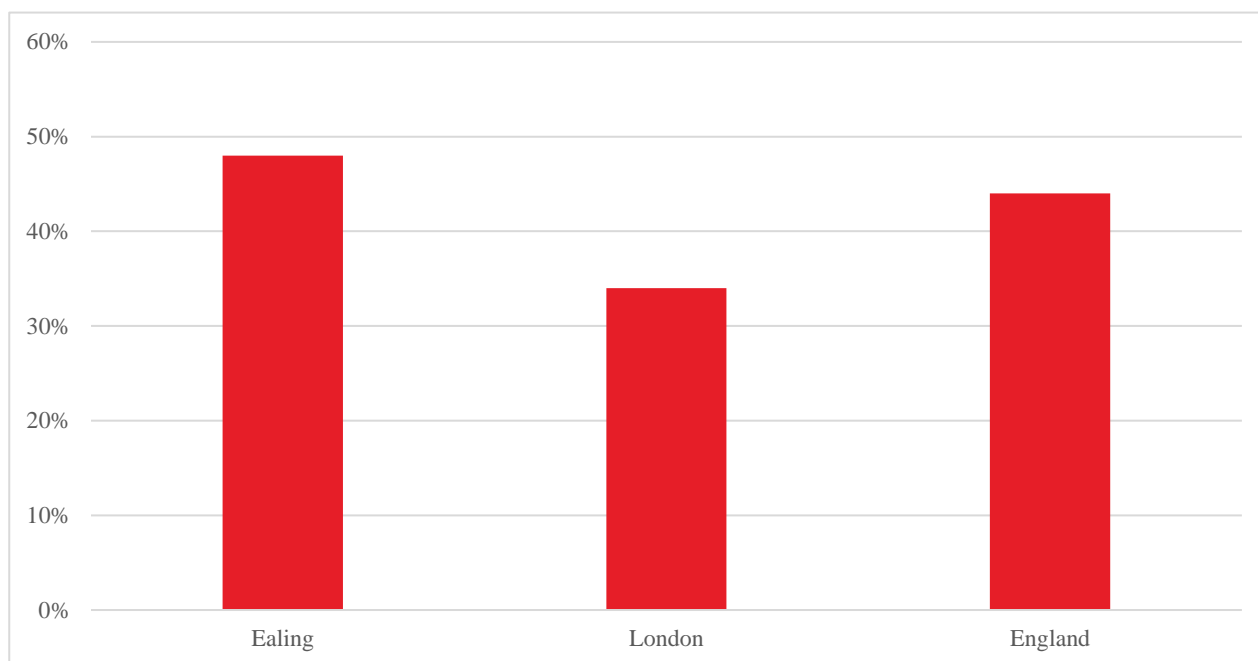
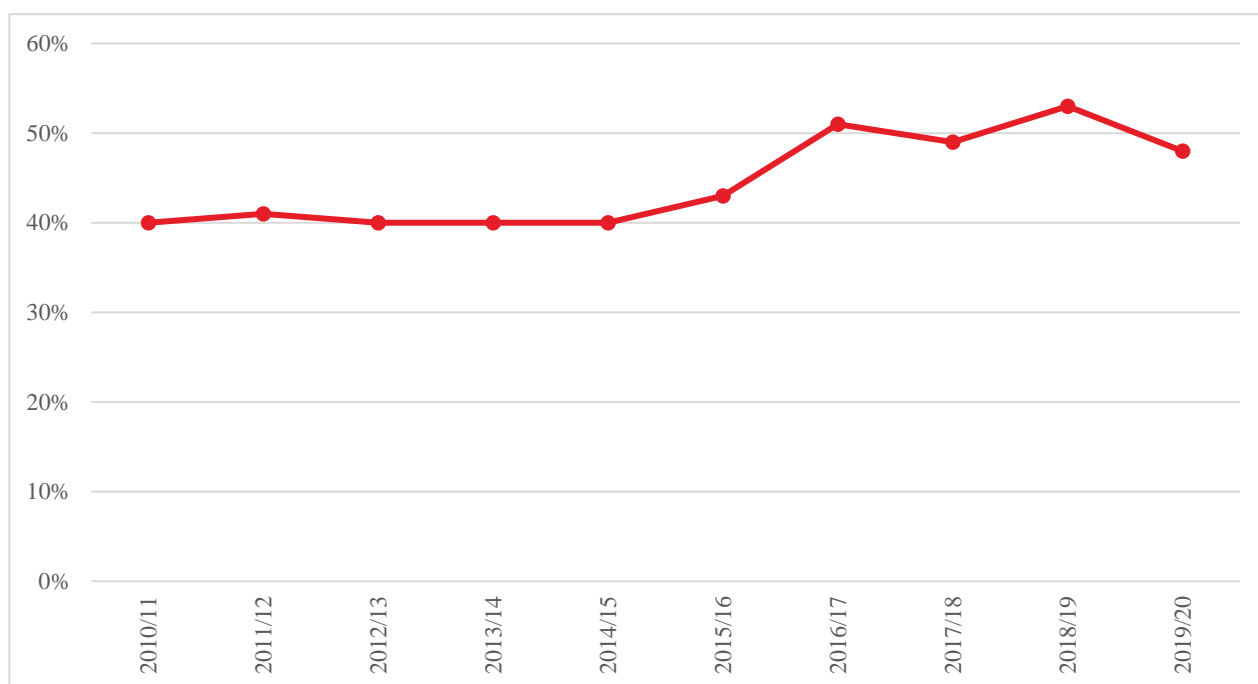


Figure 26: Recycling rates in Ealing over time

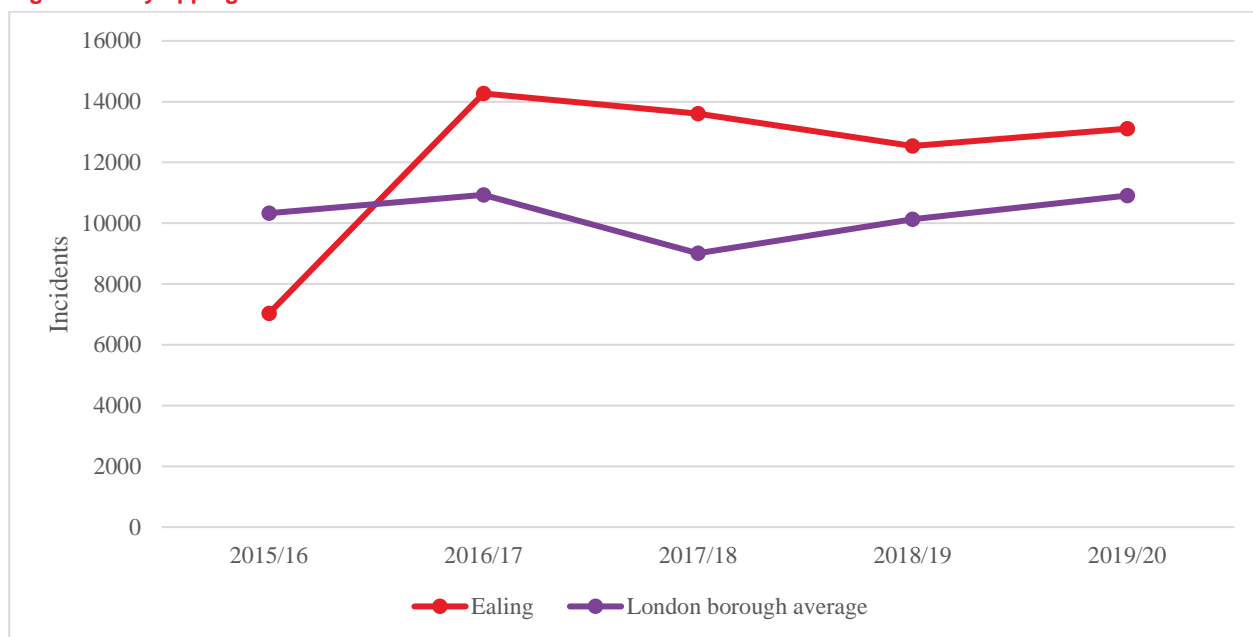


#### 1.8.4 Fly tipping

Ealing experiences a higher number of fly tipping incidents than the average London borough (Figure 27) <sup>76</sup>.

<sup>76</sup> Department for Environment, Food & Rural Affairs 2021. Fly tipping incidents and actions taken in England. Available online at: <https://www.gov.uk/government/statistical-data-sets/env24-fly-tipping-incidents-and-actions-taken-in-england>

**Figure 27: Fly tipping incidents**



### 1.8.5 Material assets and land use summary

Table 19 summarises the key features of the material assets and land use baseline and outlines considerations for the IIA and Local Plan in relation to these topics.

**Table 17: Material assets and land use baseline summary**

Key baseline features	Considerations
<p>A number of brownfield sites and land designated for its industrial value</p> <p>Recycling rate has stalled around 50% in recent years</p> <p>High levels of fly tipping</p> <p>Principal and Secondary A aquifers</p>	<p>Continue to boost recycling rate to meet 60% target.</p> <p>Reduce overall waste volumes through reduce and reuse initiatives.</p> <p>Facilitate the delivery of additional waste management capacity.</p> <p>Work towards the goal of achieving self-sufficiency in waste management.</p> <p>Promote circular economy principles.</p> <p>Protect and enhance the network of open space.</p> <p>Maximise urban greening.</p> <p>Protect key areas of industrial land to contribute to the London economy.</p> <p>Promote the redevelopment of brownfield land with appropriate remedial measures.</p> <p>Protect key groundwater aquifers</p>

## 1.9 Historic environment and townscape

### 1.9.1 Townscape and landscape

The landscape in Ealing generally rises gradually away from the Thames and towards higher ground in the north-west, on the rim of the London Basin. There are a variety of hills toward the north which provide views across the borough.

A key feature of Ealing is the River Brent, which bisects the borough. This is an important part of the blue infrastructure provision in the borough, alongside man-made canals including the Grand Union Canal.



Ealing comprises seven broad sub-areas, each of which has a distinctive character<sup>77</sup>. The central and eastern parts of the borough are denser and more similar to central London, whereas the western and northern parts are less dense and connected and therefore more typical of an outer-London borough. There are variety of housing types in Ealing, including cottage estates, flats and semi-detached houses. Significant 20<sup>th</sup> Century estates are located in Pitshanger and South Acton.

Across the borough there are a range of building heights and densities. Higher densities are typically centred around town centres such as Ealing, Acton and Hanwell and tall buildings are typically concentrated in parts of North Acton, South Acton, Southall and Greenford.

Uxbridge Road, running through the south of the borough, is a historical arterial road. This has played a key role in the development of Ealing with town centres, Acton, Ealing, Hanwell and Southall, located along the route.

### 1.9.2 Built heritage

Cultural heritage assets are found across Ealing and include listed buildings and scheduled monuments (Figure 28). There are six scheduled monuments in the borough. Two of these, the 'Moated site at Down Barns Farm' and the 'Hanwell flight of locks and brick boundary wall of St Bernard's Hospital', are deemed to be 'at risk' by Historic England.

Listed buildings are mostly located in the historic settlements of Acton, central Ealing, Bedford Park, Norwood Green, and Northolt Village. There are three Grade I listed buildings and four registered parks and gardens.

Conservation Areas are locations designated by Historic England to protect their special architectural and historic interest. There are 29 Conservation Areas within Ealing, six of which are deemed to be 'at risk' by Historic England.

### 1.9.3 Archaeology

There are 23 Archaeological Priority Areas (APA) within Ealing. APAs are areas specified by the local planning authority to help protect archaeological remains that may be affected by development<sup>78</sup>.

A number of prehistoric archaeological finds have been recorded in the borough, particularly from the Lower Palaeolithic period along the Southall, Hanwell, Ealing, Acton corridor<sup>79</sup>.

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<sup>77</sup> Ealing Council 2020. Draft Character Study and Housing Design Guidance. Available online at: <https://ealingmatters.org.uk/wp-content/uploads/2020/11/200722-Appendix-D-Ealing-Character-Study-copy.pdf>

<sup>78</sup> Historic England. Ealing Archaeological Priority Areas. Available online at: <https://historicengland.org.uk/content/docs/planning/apa-ealing-pdf/>

<sup>79</sup> Museum of London Archaeology (MOLA) 2021. The Archaeology of Greater London online map. Available online at: <https://molarchaeology.maps.arcgis.com/apps/MapSeries/index.html?appid=9a85640effc042ae91af6b0d43abbafb>



### 1.9.4 Historic environment and townscape

Table 18 summarises the key features of the townscape and heritage baseline and outlines considerations for the IIA and Local Plan in relation to these topics.

**Table 18: Historic environment and townscape baseline summary**

Key baseline features	Considerations
<p>A diverse townscape with distinct characters within the different sub-areas.</p> <p>Concentrations of taller buildings and more dense areas towards specific parts of the borough.</p> <p>A number of key heritage assets and designated areas across the borough, some of which are listed on the at-risk register.</p>	<p>Development in line with protecting or enhancing conservation areas.</p> <p>Development which complements the historic character of the towns and assets.</p> <p>Consider the existing building heights and density when proposing development in different parts of the borough.</p> <p>Increase awareness of local designated and non-designated heritage assets.</p> <p>Enhancement and protection of designated and non-designated heritage assets and their settings, including to support their removal from the at-risk register.</p>

## 1.10 Biodiversity

### 1.1.1 Designated ecological sites

There are no Special Areas of Conservation (SAC) or Special Protection Areas (SPA) within Ealing. The closest sites are Richmond Park (SAC) over 5km to the south and the South-west London Waterbodies (SPA) over 7km to the south-west.

Within Ealing there are nine Local Nature Reserves (LNR) and a further three within 1km (Figure 29). There are also three areas of ancient woodland within 1km as well as sporadic areas of deciduous and broadleaved woodland, grasslands and several parks / gardens, most notable Osterley Park in the south of the borough.

Sites of Importance to Nature Conservation (SINCs) are designated by local authorities as areas of local importance to wildlife and biodiversity<sup>80</sup>. There is a hierarchy of SINC designations in place in London: Sites of Metropolitan Importance, Borough Importance and Local Importance.

Within Ealing, the London Canals are considered to be of Metropolitan Importance and are therefore considered to contain the best of examples of London's habitat and are of the highest priority for protection. Horsenden Hill, Yeading Brook and Islip Manor are also similarly graded.

### 1.10.1 Other habitats and species

There is generally a strong network of green infrastructure including parks and gardens and over 24,000 street trees and 50,000 trees in parks<sup>81</sup>.

Habitats and sites within Ealing considered to be Critical Natural Capital, meaning that if lost there would be long-term / permanent loss of biodiversity, include four ancient woodland sites, five sites of unimproved pastures and the River Brent.

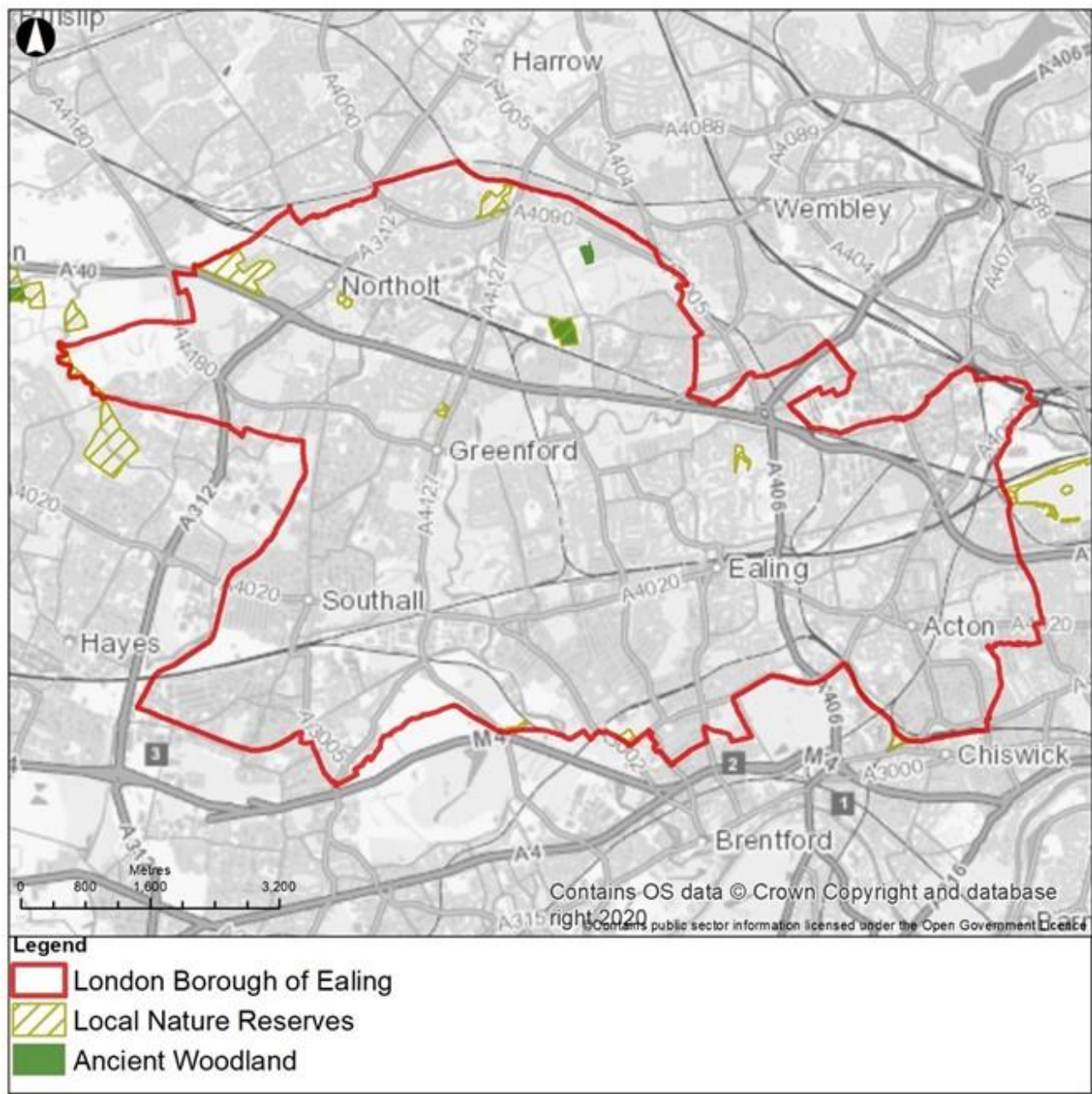
The top priority species in the borough which are threatened or declining are water vole (mammal), great crested newt (amphibian), sp. flycatcher (bird) and numerous fungi.

<sup>80</sup> Greater London Authority. Biodiversity. Available online at: <https://www.london.gov.uk/what-we-do/environment/parks-green-spaces-and-biodiversity/biodiversity>

<sup>81</sup> Ealing Council 2020. Draft Character Study and Housing Design Guidance. Available online at: <https://ealingmatters.org.uk/wp-content/uploads/2020/11/200722-Appendix-D-Ealing-Character-Study-copy.pdf>



Figure 29: Ecological sites



1.10.2 Biodiversity summary

Table 18 summarises the key features of the biodiversity baseline and outlines considerations for the IIA and Local Plan in relation to this topic.

**Table 19: Biodiversity baseline summary**

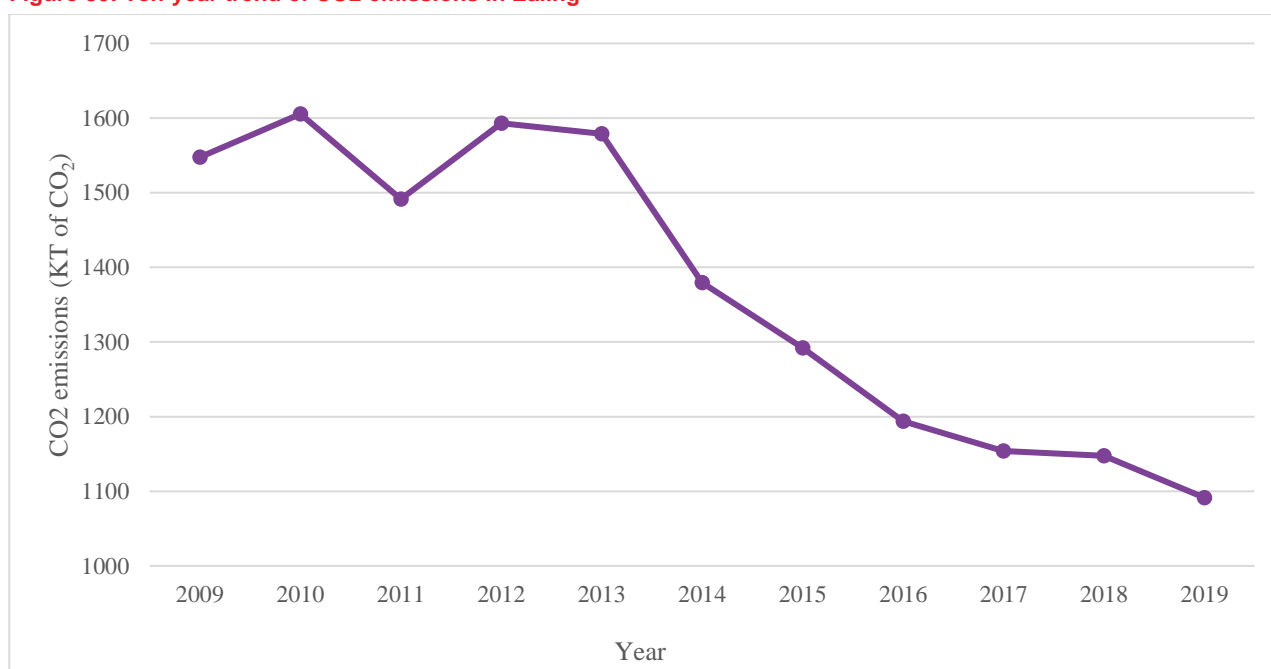
Key baseline features	Considerations
Local sites of ecological importance throughout the borough. Important green spaces and green infrastructure that will supporting wildlife in the borough, including parks and street trees.	Protect and enhance existing sites of value for nature conservation. Enhance the biodiversity potential of parks and open spaces by maintaining and improving best practice for habitat management. Implement the mitigation hierarchy and secure biodiversity net gain. Reduce deficiency in access to nature. Achieve targets to increase grassland, wetland and woodland habitats. Enhance the green corridor to help connect the open spaces across the borough. Enhance blue ribbon designations along key waterways for nature conservation and flood management purposes, as well walking and cycling provision.

## 1.11 Climate Change

### 1.11.1 Greenhouse gas emissions

Ealing has declared a climate emergency and produced a strategy to help reach the goal of becoming carbon neutral by 2030<sup>82</sup>. In 2018 approximately 1,120,600 tonnes was produced, equating to approximately 3.3 tonnes of CO<sub>2</sub> per person. Domestic uses accounted for 39%, industry and commercial 33% and transport 28%. Emissions fluctuated between 2009 and 2012 but have since been decreasing (Figure 30)<sup>83</sup>.

**Figure 30: Ten-year trend of CO2 emissions in Ealing**



<sup>82</sup> Ealing Council 2021. Climate and ecological emergency strategy 2021-2030. Available online at: [https://www.ealing.gov.uk/downloads/download/6005/climate\\_and\\_ecological\\_emergency\\_strategy](https://www.ealing.gov.uk/downloads/download/6005/climate_and_ecological_emergency_strategy)

<sup>83</sup> BEIS 2021. Local authority and regional carbon dioxide emissions national statistics. Available online at: <https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019>

### 1.11.2 Climate change trends

Research into the impacts of climate change predict that by 2050 the average monthly temperatures in London will be 5-6°C higher than present. This will have an impact on the infrastructure and operation of the city as well as population health and comfort<sup>84</sup>.

### 1.11.3 Climate change summary

Table 18 summarises the key features of the climate change baseline and outlines consideration for the IIA and Local Plan in relation to this topic.

**Table 20: Climate change baseline summary**

Key baseline features	Considerations
Increase in number and scale of extreme weather events. Increase in average temperatures	Implement mitigation strategies to reduce the vulnerability of people, ecology and infrastructure to a changing climate and extreme weather events. Improving the energy performance of buildings. Ensuring that new developments qualify as zero carbon.

## 1.12 Water and flood risk

### 1.12.1 Flood risk

Overall Ealing is considered to be at low risk of flooding, however, there are localised areas at greater risk due to factors such as proximity to watercourses and drainage systems.

Ealing largely lies within Flood Zone 1 meaning the area has a low probability of flooding. The River Brent poses the largest risk of flooding with areas of Flood Zone 3 located adjacent to the channel<sup>85</sup>.

Surface water flooding is strongly influenced by land use and topography. Across Ealing there are many modelled surface water flow-paths as well as isolated areas of surface water ponding. Areas at risk of surface water flooding are similarly zoned as for fluvial and tidal sources.

The mapped superficial deposits within Ealing are a mixture of clay, silt, sand and gravel<sup>86</sup> and superficial aquifer designations show predominantly unproductive strata with areas of Principal and Secondary A aquifers<sup>87</sup>. The bedrock is London Clay Formation (clay and silt)<sup>86</sup> and the bedrock aquifer designation is largely classified as unproductive with a small number of Secondary A pockets<sup>87</sup>.

The groundwater vulnerability map<sup>87</sup> (DEFRA, 2022) shows the majority of Ealing lies on unproductive aquifers with areas of aquifers designated with low to medium-high vulnerability.

There are no Source Protection Zones (SPZs) within Ealing<sup>87</sup>. This indicates that there are no licensed groundwater abstractions used for potable supply.

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<sup>84</sup> GLA 2018. London Environment Strategy. Available online at: [https://www.london.gov.uk/sites/default/files/adapting\\_to\\_climate\\_change.pdf](https://www.london.gov.uk/sites/default/files/adapting_to_climate_change.pdf)

<sup>85</sup> Gov.UK. Likelihood for flooding in this area mapping tool. Available online at: <https://flood-map-for-planning.service.gov.uk/confirm-location?easting=517868&northing=180795&placeOrPostcode=Ealing>

<sup>86</sup> British Geological Survey 2022. Geology of Britain viewer (classic). Available online at: <https://mapapps.bgs.ac.uk/geologyofbritain/home.html>

<sup>87</sup> Department for Environment, Food & Rural Affairs 2022. MAGIC Map. Available online at: <https://magic.defra.gov.uk/magicmap.aspx>

According to the LBE Local Flood Risk Management Strategy there are also several areas across the borough potentially at risk of groundwater flooding.<sup>88,89</sup>

1.12.2 Drainage Areas

Critical Drainage Areas (CDA) are areas that has critical drainage problems as notified by the Local Authority and / or Environment Agency. A number of CDAs are identified in Ealing and the central and western areas of the borough are particularly at risk.

The CDAs are at risk from multiple flood sources, mainly surface water flooding in combination with sewers and other watercourses and this interaction is likely to get more complex due to the impacts of climate change.

1.12.3 Water resources

Although London has a relatively resilient water supply supplied by both groundwater and surface water sources, and supported by reservoirs and artificial aquifer recharge, below average rainfall, particularly over winter, can put a strain on resources. Average daily water consumption in London is also already over 10% higher than the national average and it is forecasted that by 2040 London will have a water supply deficit of 400m litres per day.<sup>90</sup>

1.12.4 Water and flood risk summary

Table 21 summarises the key features of the water and flood risk baseline and outlines consideration for the IIA and Local Plan in relation to these topics.

Table 21: Water and flood risk baseline summary

Key baseline features	Considerations
Generally low levels of flood risk across the borough, except near to the River Brent. Potential increase in number of CDAs.	Increase the number of flood storage areas. Ensure developments are steered to areas of lowest risk of flooding, and that measures to consider flood risk are included within proposals. Maximise sustainable drainage methods to achieve greenfield run-off rates. Assess and improve local drainage network, including consideration of protection and enhancement of the river corridor. Safeguard water resources, e.g. by reducing system leakages.

<sup>88</sup> Ealing Council 2016. London Borough of Ealing Local Flood Risk Management Strategy. Available online at: [https://www.ealing.gov.uk/download/downloads/id/9272/local\\_flood\\_risk\\_management\\_strategy.pdf](https://www.ealing.gov.uk/download/downloads/id/9272/local_flood_risk_management_strategy.pdf)

<sup>89</sup> West London Boroughs, 2018. West London Strategic Flood Risk Assessment. Available online at: <https://westlondonsfra.london/1-introduction/>

<sup>90</sup> Ibid.



## Appendix C

### Updated IIA policy review

Review of relevant plans, programmes and strategies.

#### A.1.1 General policy

##### A.1.1.1 International

**The Aarhus Convention (1997)** is a commitment to the protection of the right of every person to live in an environment adequate to their health and well-being, guaranteeing the rights of access to information, public participation in decision-making, and access to justice in environmental matters.

##### A.1.1.2 National

The **National Planning Policy Framework (Revised) (2021) (NPPF)** sets out the Government's planning policy for England and how they are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development, which includes economic, social and environmental dimensions. It specifically requires Local Plans to:

- be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and
- serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

##### A.1.1.3 Regional

The **London Plan - The Spatial Development Strategy for Greater London (2021)** is an overall framework for development over the next 20-25 years. It is the London-wide strategic policy context within which boroughs should set their detailed local planning policies. It brings together the geographic and locational aspects of other strategies and provides the policy framework for the Mayor's own decisions on strategic planning.

##### A.1.1.4 Local

The **Council Plan for 2021-22** sets out the Council's vision for Ealing across three priority areas: creating good jobs; tackling the climate crisis; and fighting inequality. The Plan sets performance targets which can be monitored via a dashboard.

There are also Local Plans related to the neighbouring planning authorities:

- **Brent Local Plan (2022);**
- **Hammersmith and Fulham Local Plan (2018);**
- **Hounslow Local Plan (2015), and Draft Local Plan Reviews (2020) – GWC & WoB;**
- **Hillingdon Local Plan (2012), and Local Plan Part 2 (2020);**

- Harrow Core Strategy (2012); and
- OPDC Local Plan (2022).

## A.1.2 Population, demographics and equality groups

### A.1.2.1 International

The **United Nations 2030 Agenda for Sustainable Development** provides a blueprint for peace and prosperity for the people and the planet. At the heart of this plan are 17 Sustainable Development Goals (SDGs) which are urgent actions that all countries must contribute to in a global partnership.

### A.1.2.2 Local

The **Ealing Equality and Diversity Policy** aims to support the Council in delivering services tailored to people's needs through the following objectives:

- Eliminate unlawful discrimination, harassment and victimization.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Ensure a robust and accurate evidence base of equality information relating to our workforce and the community.
- Ensure equality related evidence is embedded into the decision-making process and forms an integral part of the evidence base for strategy and project development and delivery.

## A.1.3 Housing

### A.1.3.1 National

**Laying the foundations: a housing strategy for England (2011)** aims to provide support to the delivery of new homes and to improve social mobility.

### A.1.3.2 Regional

The **London Housing Strategy (2018)** outlines the Mayor's vision for housing in the capital, alongside policies and proposals to achieve it. It covers building homes, delivering affordable and high quality homes, creating inclusive neighbours, supporting fairer deals for private renters, and tackling homelessness and rough sleepers.

### A.1.3.3 Local

The **Ealing Council Rough Sleeping Strategy 2020-2025 (2020)** aims to reduce, and then eliminate, rough sleeping within the borough. It has four strategic priorities covering preventing rough sleeping, early intervention, working in partnership with Stabilise Lives, and sustainable independence.

The **Ealing Homelessness Reduction Strategy 2018-2022 (2018)** sets out Ealing's plan to reduce homelessness. It has several key aims around preventing homelessness, facilitating employment and financial inclusion, reducing future financial risk, and reducing the cost of temporary accommodation.

The **Ealing Housing and Homelessness Strategy (2014-2019)** aims to address housing issues within the borough through the provision of affordable and high quality housing, improving access to affordable homes, meeting the needs of older and vulnerable residents and preventing homelessness. The Strategy is supported by sub-strategies on private sector housing, tenancy, and empty properties.

The **West London Strategic Housing Market Assessment (2018)** sets out the need and demand for housing across the West London Alliance (Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon, Hounslow and OPDC). It seeks to establish housing need between 2016 and 2014, addressing the need for all types of housing across the boroughs including rented and self-build homes, and housing suitable for families, older people and those with specific needs.

## A.1.4 Economy, Employment and Education

### A.1.4.1 National

The **Industrial Strategy: building a Britain fit for the future (2017)** is a white paper which sets out the long-term plan to boost productivity and earning power for UK citizens. It sets out the government's plans to support businesses create better, higher paying jobs with investment in skills, industries and infrastructure.

The **Ten Point Plan for a Green Industrial Revolution (2020)** is a policy paper which sets out the Government's areas of focus for a green economic recovery: advancing offshore wind; driving the growth of low carbon hydrogen; delivering new and advanced nuclear power; accelerating the shift to zero emission vehicles; green public transport, cycling and walking; 'net zero' and green ships; greener buildings; investing in carbon capture, usage and storage; protecting our natural environment; green finance and innovation.

### A.1.4.2 Local

The **Ealing Employment and Skills Strategy (2014)** sets out how the council aims to enable its residents to overcome barriers to employment, improve their lives and so fulfil their potential.

The **Ealing Learning Partnership Strategy and Delivery Plan 2019-2021 (2019)** aims to promote educational excellence and well-being within the borough through various priorities including: learning and development, safeguarding and well-being, progression and pathways to employment and financially sustainable schools.

The **West London Affordable Workspace Study (2020)** identifies the need for, and potential approach to, deliver affordable workspace across West London.

The **West London Employment Land Evidence (2019)** considers the future needs of commercial, industrial and employment land across Ealing, Brent, Barnet and Harrow. It looks at the degree to which needs can be met through emerging policy responses to the intensification, co-location, substitution and recycling of existing sites.

## A.1.5 Health and well-being

### A.1.5.1 National

The **Public Health England (PHE) Strategy 2020-2025** sets out how PHE will work to protect and improve the public's health and reduce health inequalities over the next five years.

**Fair Society, Healthy Lives (2010)**, known as the **Marmot Review**, is a review of health inequalities in England. It sets out six key objectives to reduce health inequalities including: give every child the best start in life; enable all children, young people and adults to maximise their capabilities and have control over their lives; create fair employment and good work for all; ensure

healthy standard of living for all; create and develop healthy and sustainable places and communities; and strengthen the role and impact of ill-health prevention.

## A.1.5.2 Local

The **Ealing Health and well-being Strategy 2016-2021 (2016)** sets out health and well-being priorities for Ealing. It includes priorities to ensure all key organisations work better together to improve health and well-being, improve health and well-being in schools and workplaces, create environments that help people to make healthy choices and support residents and communities to manage their health.

The **Ealing Healthy Weight Healthy Lives Strategy (2016)** seeks to increase the number of children and adults who are of a healthy weight.

The **Ealing Mental Health and Well-being Strategy for Adults 2017-2022 (2017)** sets out five outcomes that will contribute to improving mental health and well-being in the borough:

- Prevention and well-being;
- Better outcomes and support for people with common mental health needs;
- New model of care for people with serious and long term mental health needs;
- Working better together; and
- Reaching all our communities.

The **Ealing Carers' Strategy 2018-2023 (2018)** sets out action to support carers of all ages and their families.

The **Ealing Sports Facility Strategy 2012-2021 (updated 2018)** sets out a vision for improving quality of life through sport and physical activity through raising the profile of sport, improving access to sport, and providing appropriate facilities and funding.

## A.1.6 Transport and connectivity

### A.1.6.1 National

**Decarbonising Transport: Setting the Challenge (2020)** sets out what the government, businesses and society need to do to deliver significant reductions in emissions across all modes of transport.

### A.1.6.2 Regional

The **Mayor's Transport strategy (2018)** sets out the Mayor's policies and proposals to reshape transport in London over the next 25 years. The key objectives of the strategy are: healthy streets and healthy people; a good public transport experience; and new homes and jobs.

### A.1.6.3 Local

The **Ealing Local Implementation Plan (Transport) 2019-2022 (2019)** out how Ealing Council will support the Mayor's Transport Strategy and it's goals

The **Ealing Council Transport Strategy 2019-2022 (2019)** sets out the Council's transport priorities for the period 2019-2022, focusing on three key objectives: mode shift, reducing the environmental footprint of transport, and improving road safety.

## A.1.7 Air and noise pollution

### A.1.7.1 International

The **EU Directive on ambient air quality and cleaner air for Europe (2008)** sets binding standards and target dates for reducing concentrations to SO<sub>2</sub>, NO<sub>2</sub>/NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, CO, benzene and lead. The directive seeks to maintain ambient air quality in areas where it is good, and improve it in other areas.

#### **A.1.7.2 National**

The **Clean Air Strategy (2019)** sets out plans for dealing with all sources of air pollution, making air healthier to breathe, protecting nature and boosting the economy. It includes a set of stringent targets to cut emissions by 2020 and 2030.

#### **A.1.7.3 Local**

The **Ealing Air Quality Action Plan 2017-2022 (2017)** outlines actions that will be taken to reduce air pollution within the borough.

### **A.1.8 Material assets and land use**

#### **A.1.8.1 International**

The **Waste Framework Directive (2008/98/EC)** establishes the legislative framework for the handling of waste in the community. The objectives are to provide a comprehensive and consolidated approach to the definition and management of waste; to shift the thinking of waste from an unwanted burden to a valued resource and make Europe a recycling society; to ensure waste management starts with waste prevention; and to provide environmental criteria for certain waste streams, to establish when a waste ceases to be a waste.

#### **A.1.8.2 National**

The **National Planning Policy for Waste (2014)** sets out the Government's ambition to work towards a more sustainable and efficient approach to the use and management of resources. The objectives of this planning policy are to:

- Deliver sustainable development and resource efficiency;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities and businesses are engaged with and take more responsibility for their own waste;
- Help to secure waste re-use, recovery and disposal; and
- Ensure the design and layout of new residential and commercial developments and other infrastructure complements sustainable waste management.

**Safeguarding our Soils: A Strategy for England (2009)** outlines a vision for all soils in England to be managed sustainably and the threat of degradation managed by 2030. This would improve the quality of England's soils and safeguard their ability to provide essential services for future use.

#### **A.1.8.3 Local**

The **West London Waste Plan (2015)** is a strategy for the sustainable management of waste across Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond upon Thames through to 2031. Priorities are waste reduction, recycling and composting.

### **A.1.9 Townscape and heritage**

#### **A.1.9.1 International**

The **Basic Texts of the 1972 World Heritage Convention (2005)** requires that cultural and natural heritage is identified, protected and conserved.

The **European Landscape Convention (2000)** notes that the landscape is favourable to economic activity and has an important public interest role in the cultural, ecological, environmental and social fields. The objectives are to promote European landscape protection, management and planning, and to organise European co-operation on landscape issues.

The **Convention for the Protection of the Architectural Heritage of Europe (1985)** sets out requirements for the protection of architectural heritage, and establishes principles of “European co-ordination of conservation policies”.

#### **A.1.9.2 National**

The **Historic England Corporate Plan (2018-2021)** is an action plan to deliver priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector’s priorities for the historic environment.

The **Planning (Listed Buildings & Conservation Areas) Act (1990)** sets out designation procedures, planning requirements and associated enforcement for listed buildings and conservation areas.

The **Ancient Monuments & Archaeological Areas Act (1979)** makes provision for the investigation, preservation and recording of matters of archaeological or historical interest, and for the regulation of activities affecting such matters.

#### **A.1.9.3 National**

There are **Conservation Area Appraisals** and **Management Plans** covering all 29 conservation areas within the London Borough of Ealing. Each appraisal outlines the history of the area and the elements that contribute to its character and appearance, and each management plan sets out policy statements for the preservation and enhancement of the area.

### **A.1.10 Biodiversity**

#### **A.1.10.1 International**

The **EU Biodiversity Strategy for 2030 (2020)** is a long-term plan for Europe’s biodiversity recovery and a proposal for the EU’s contribution to international biodiversity negotiations.

The **EU Birds Directive (2009)** places emphasis on the protection of habitats for endangered as well as migratory species, especially through the establishment of a coherent network of Special Protection Areas (SPAs) comprising all the most suitable territories for these species.

**Ramsar Convention on Wetlands of International Importance, especially as waterfowl habitat (1971)** is an international treaty for the conservation and wise use of all wetlands through local, regional and national actions and international cooperation, as a contribution towards achieving sustainable development throughout the world.

The **Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (1992)** aims to conserve natural habitats, wild fauna and flora. Member states must take measures to maintain or restore favourable conservation status of natural habitats and species of importance. This includes sites such as Special Areas of Conservation (SAC), SPA and Ramsar sites. Plans that might impact the integrity of a designated site would be subject to an Appropriate Assessment.

#### **A.1.10.2 National**

The **25 Year Environment Plan (2018)** sets out goals for improving the environment over the next 25 years. It includes a number of targets such as clean air, clean and plentiful water, thriving plants



and wildlife, reducing environmental hazards, using resources more sustainably, enhancing the natural environment, mitigating and adapting to climate change, and minimising waste.

#### **Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)**

documents the biodiversity strategy for England, providing a comprehensive picture of how the country is implementing international and EU commitments. It specifically sets out the strategic direction for biodiversity policy over the next few years on land and sea.

#### **A.1.10.3 Regional**

The **London Environment Strategy (2018)** identifies the key environmental challenges in London including air quality, biodiversity, greenhouse gas emissions, green space, energy use, waste, heat risk, flood risk, water scarcity, water quality and ambient noise. The main aims include the best air quality of any major city by 2050, becoming the first National Park city where half of London's area is green, be a zero carbon and zero waste city and be resilient to climate change impacts.

#### **A.1.11 Climate Change**

##### **A.1.11.1 International**

The **UN Framework Convention on Climate Change (1992)** sets an overall framework for intergovernmental efforts to tackle the challenge posed by climate change. It acknowledges that the climatic system is affected by many factors and is a shared system.

The **Paris Agreement (2015)** brings together all nations in a common cause to undertake ambitious efforts to combat climate change and adapt to its effects, with enhanced support to assist developing countries to do so. The Agreement's central aim is to strengthen the global response to the threat of climate change by keeping global temperature rise this century well below 2°C.

The **EU Eighth Environmental Action Programme to 2030 (draft)** reviews the significant environmental challenges and provides a framework for European environmental policy up to 2030. The programme lists six priority objectives and what the EU needs to do to achieve them:

- achieving the 2030 greenhouse gas emission reduction target and climate neutrality by 2050
- enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change
- advancing towards a regenerative growth model, decoupling economic growth from resource use and environmental degradation, and accelerating the transition to a circular economy
- pursuing a zero-pollution ambition, including for air, water and soil and protecting the health and well-being of Europeans
- protecting, preserving and restoring biodiversity, and enhancing natural capital (notably air, water, soil, and forest, freshwater, wetland and marine ecosystems)
- reducing environmental and climate pressures related to production and consumption (particularly in the areas of energy, industrial development, buildings and infrastructure, mobility and the food system)

##### **A.1.11.2 National**

**The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018)** sets out key actions to address the risks and opportunities posed by a changing climate. It covers targets in relation to people, infrastructure, natural environment, business and industry and flood and water management.



The **Clean Growth Strategy (2017)** sets out the government's approach to facilitate growth whilst cutting greenhouse gas emissions. It sets out recommendations for private and public investment to meet carbon budgets, to improve business and industry energy efficiency and to improve energy efficiency in the housing stock including through low carbon heating.

#### A.1.11.3 Local

The **Ealing Climate and Ecological Emergency Strategy 2021-2030 (2021)** sets out the Council's response to the climate and ecological emergence across four themes: energy, nature, travel and waste.

### A.1.12 Water and flood risk

#### A.1.12.1 International

The **Water Framework Directive (2000)** establishes a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. It seeks to prevent protect and enhance aquatic ecosystems, promote sustainable water use, reduce groundwater pollution and mitigate the effects of floods and droughts.

The **Groundwater Directive (2006)** establishes a framework for the protection of groundwater to avoid the deterioration of water quality. The Directive includes groundwater quality standards and threshold values for groundwater pollutants.

The **Drinking Water Directive (1998)** aims to protect human health from adverse effects of any contamination of water intended for human consumption by ensuring that it is clean.

#### A.1.12.2 National

The **Planning Policy Guidance Flood Risk and Coastal Change (2014)** documents flood risk and coastal change in terms of planning and flood risk, taking flood risk into account in Local Plans, flood risk assessments and sequential testing.

#### A.1.12.3 Local

The **Ealing Local Flood Risk Management Strategy 2016-2022 (2016)** aims to provide clarity and direction on how flood risk is managed in the borough. It sets out five objectives:

- Develop and improve the understanding of flood risk across the borough;
- Maintain and improve communication and cooperative working between strategic parties and flood risk management authorities;
- Prevent the increase of flood risk through inappropriate development;
- Develop community awareness of flood risk and ways of reducing the risk in the future; and
- Identify and implement flood mitigation measures where funding can be secured.

The **West London Strategic Flood Risk Assessment (2018)** provides the evidence base for ensuring development does not occur in areas of high risk from flooding within Barnet, Brent, Ealing, Harrow, Hillingdon and Hounslow.

The **Ealing Council Multi Agency Flood Plan (2010)** considers community level flood risk and sets out the multi-agency response to flooding incidents in the London Borough of Ealing.

The **Surface Water Management Plan (2013)** identifies areas of significant modelled flood risk and Critical Drainage Areas which are used to improve understanding of local

## Appendix D

### IIA Sites appraisal

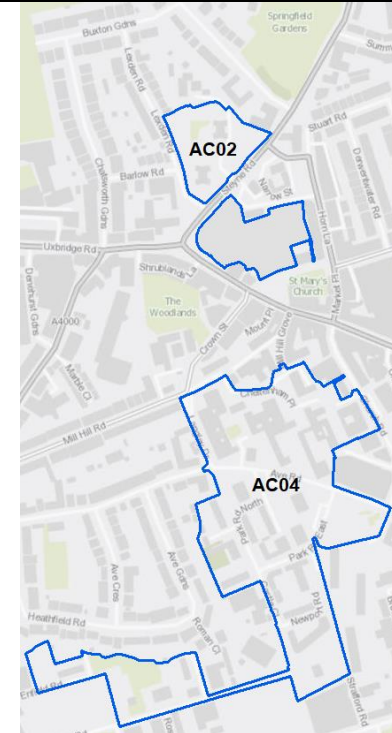
# 1. Acton

## 1.1 Moreton Tower (AC02) and Acton Gardens (AC04)

These two sites comprise predominantly high rise housing estates in central Acton interspersed with open green space.

Proposed uses are for the intensification of housing provision on both sites with some commercial uses on ground floor for AC04, which would be likely to result in a decrease in the open space available within the estates.

The sites generally experience poor air quality and noise conditions which should inform future uses and potential mitigation.



Objective	Criteria	AC02	AC04	Comment
Housing	1	+	+	Development of the sites would deliver a net increase in homes.

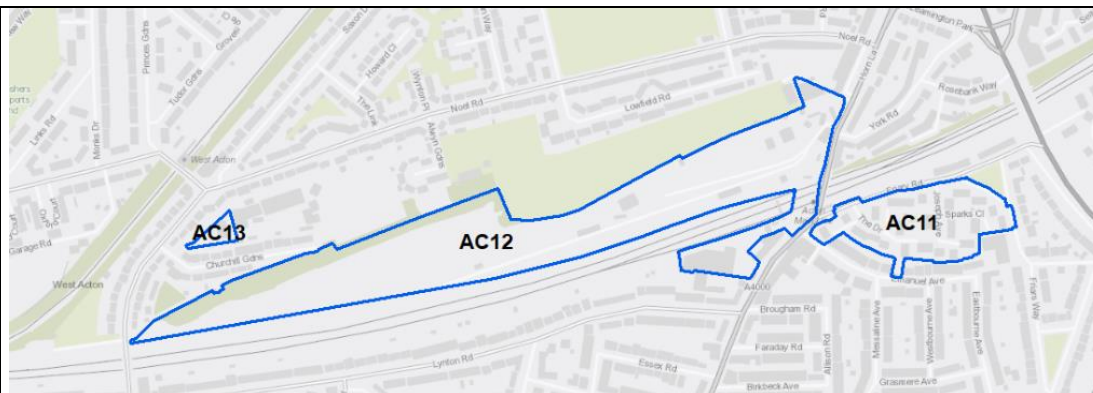
Objective	Criteria	AC02	AC04	Comment
Economy	2	0	+	Development of AC04 would result in a net increase in commercial floorspace thus increasing employment capacity compared to existing uses. The development of AC02 would result in no net change to employment capacity.
Education and skills	3	+	+	The sites are within 1km of an existing primary school.
	4	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	The sites are within 1km of an existing GP surgery.
	6	-	-	Development of the sites could result in the loss of existing open space. Offsetting or other measures may be necessary to address this loss.
	7a	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	-	0	AC02 is located within an area which exceeds either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . AC04 is partially located in an area that exceeds either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	+	Average road and rail noise levels of AC02 are at or above 55db. Sensitive uses may not be suitable without mitigation. The average road and rail noise levels of the AC04 are less than 55db.
Resources	12	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	+	AC04 is partially located within a conservation area and is within 500m of further heritage assets. The current site negatively impacts the wider heritage setting and development offers an opportunity to improve this. AC02 is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that any potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	-	Development of the site would result in a net loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.

Objective	Criteria	AC02	AC04	Comment
	15	0	0	The sites currently have low overall ecological value however there are some ecological features present. Development of the sites provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated.
	16	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	-	The sites contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	-	-	Development of the sites could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	0	AC04 is within an area of medium groundwater vulnerability. AC02 is within an area of low groundwater vulnerability.

## 1.2 Acton Main Line (AC11, AC12, AC13)

These sites are directly adjoining or within the wider corridor of the Acton Main Line. The sites currently have a mix of community, industrial and commercial uses, with a proportion retained as part of the new proposal. AC11, AC12 and AC13 will incorporate residential and some community and commercial uses.

The sites are located along either the A40 or rail corridors, and so poor air quality and noise conditions should drive consideration of housing layout/orientation and potential requirements for mitigation.



Objective	Criteria	AC11	AC12	AC13	Comment
Housing	1	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	+	?	?	Development of AC11 would result in an increase to employment capacity. Potential employment loss or gain for AC12 and AC13 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	AC12 includes a small area of open space which could be lost; however, this space is largely not publicly accessible. There would be no loss of open space from development of AC11 and AC13. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	The sites are within 1.5km of a leisure facility.

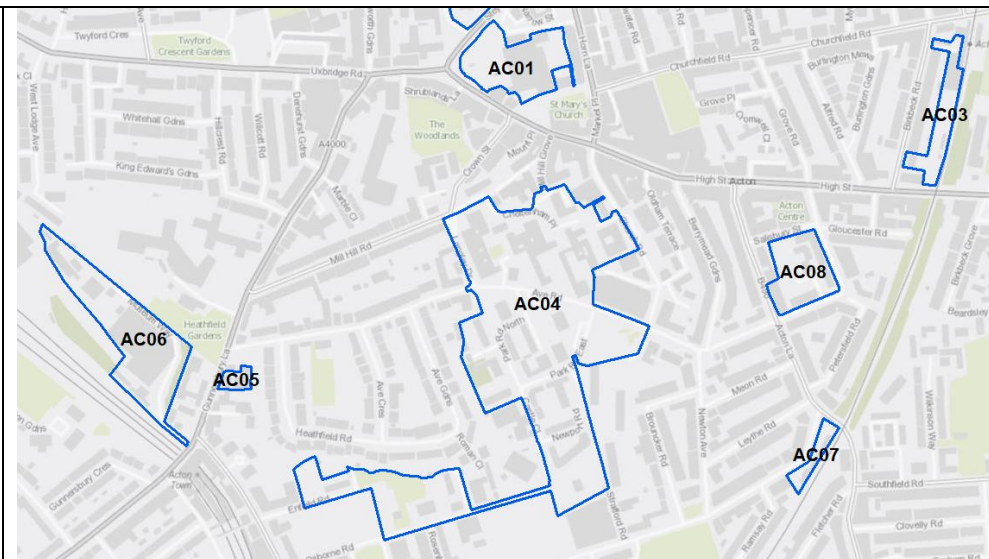
Objective	Criteria	AC11	AC12	AC13	Comment
Connectivity	8	0	+	0	The PTAL for AC11 and AC13 is between 2 and 3. The PTAL for the remaining sites is between 4 and 6b.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	-	0	0	AC11 is located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. AC12 and AC13 are partially located in areas that exceed either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	0	All sites are on previously developed land. AC11 and AC12 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	The sites are within 500m of heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	0	-	0	Development of AC12 could result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity. The remaining sites do not offer opportunities for habitat connectivity.
	15	+	0	+	AC12 currently has low overall ecological value however there are some ecological features present (area of trees). Development of the sites provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated. The remaining sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	+	0	AC12 is a large site partially located within an ecologically designated SINC along its border with the railway. The site is in poor condition and development offers opportunities for improving the local network of ecologically designated sites. The remaining sites are not located within ecologically designated sites.
Water resources	17	0	-	0	AC12 contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	0	+	0	Development of AC12 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the remaining sites is unlikely to impact flood risk.
	19	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.



### 1.3 Central Acton (AC05, AC01, AC03, AC08, AC07, AC06)

These sites in central Acton have a mix of current uses, and all are proposed for housing provision, with AC01, AC05, AC06, AC07 and AC08 proposed to also include some mixed commercial uses (including office, industrial, research and leisure)

Many of the sites are located either adjacent to the rail corridor or to the A4020 Uxbridge Road, and so poor air quality and noise should drive consideration of layout and potential requirements for mitigation.



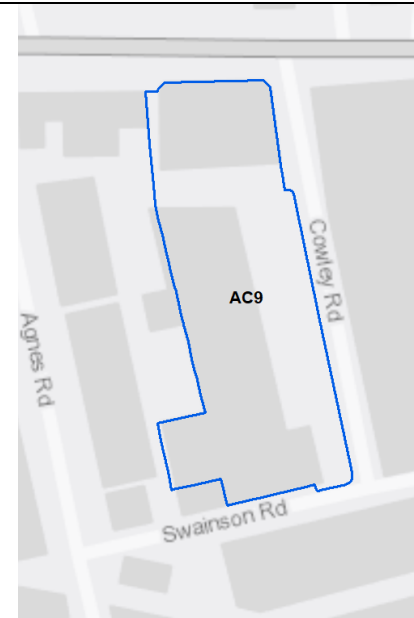
Objective	Criteria	AC01	AC03	AC05	AC06	AC07	AC08	Comment
Housing	1	+	+	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	-	?	+	?	+	AC03 currently provides commercial and industrial employment. Development of the site would therefore result in a net loss of employment capacity under the proposed fully residential schemes. Development of AC06 would result in an increase in employment capacity as it is currently used for museum storage with minimal employment opportunities on-site whilst proposed uses look to deliver retail and community uses. Development of AC08 would result in an increase to employment capacity as currently there is no employment on site and proposal looks to deliver commercial uses. Potential employment loss or gain for AC05, AC01 and AC07 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	+	+	+	+	The sites are within 1km of an existing primary school.

Objective	Criteria	AC01	AC03	AC05	AC06	AC07	AC08	Comment
	4	+	+	+	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	0	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	0	+	+	0	+	The PTAL for AC03 and AC07 is between 2 and 3. The PTAL for the remaining sites is between 4 and 6b.
	9	+	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	-	-	-	0	-	-	All sites except for AC06 are located within areas which exceed either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. AC06 is partially located in an area that exceeds either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	-	-	+	Average road and rail noise levels of the sites are at or above 55db, except for AC08. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	+	+	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	+	+	0	0	+	AC05, AC01, AC03, and AC08 are located partially within or adjacent to conservation areas and are within 500m of further heritage assets. The current sites negatively impact the wider heritage setting and development offers an opportunity to improve this. AC07 and AC06 are within 500m of heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	0	+	0	+	+	0	AC03, AC07 and AC06 offer some limited potential for improving habitat connectivity through proximity to open spaces along the railway corridor. The remaining sites are in a dense urban area and do not offer opportunities for habitat connectivity.

Objective	Criteria	AC01	AC03	AC05	AC06	AC07	AC08	Comment
	15	+	+	+	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity through biodiversity net gain measures which can help achieve positive biodiversity net gain
	16	0	0	0	0	0	0	AC03 and AC06 are partially located within an ecologically designated SINC in small areas along their borders with the railway however the sites are in poor condition and development is unlikely to impact the local network of ecologically designated sites. The remaining sites are not located within ecologically designated sites.
Water resources	17	-	-	0	-	-	0	AC01, AC03, AC07 and AC06 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	+	0	0	+	+	0	Development of AC01, AC07 and AC06 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the remaining sites is unlikely to impact flood risk.
	19	+	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 1.4 Acton Vale Industrial Park & Westgate House (AC09)

This site in the east of Acton is just outside of the main Acton Vale industrial area. The site currently provides industrial and commercial uses and is proposed as a mixed-use development providing higher intensification in commercial and industrial uses. The site experiences poor air quality and noise conditions which should drive consideration of uses, layout and potential requirements for mitigation.



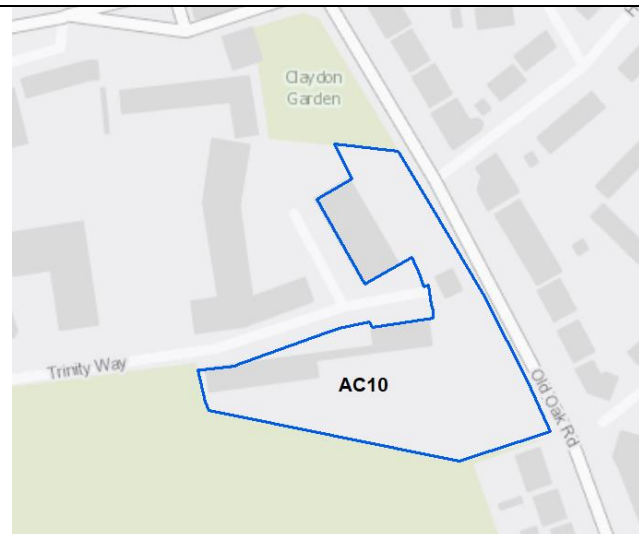
Objective	Criteria	AC09	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	+	Development of the site would deliver new employment capacity as the proposed mixed-use development would provide employment intensification across a wider range of employment opportunities.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.

Objective	Criteria	AC09	Comment
	6	0	There would be no loss of open space from development of the site. There may be opportunities to provide new open space dependent on the design of proposed development.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	0	The PTAL for the site is between 2 and 3.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	0	The site is in a dense urban area and do not offer opportunities for habitat connectivity.
	15	+	The site currently has low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	+	Development of the site offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	+	The site is not within an area of groundwater vulnerability.

## 1.5 Haddon Court & Burghley Tower (AC10)

This site is in northeast Acton. The site is currently predominantly open space, with two residential buildings. the site is proposed for fully residential development with some open space.

Development of the site would likely result in a loss of open space. The site is located near to the A40, and so poor air quality and noise conditions should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	AC10	Comment
Housing	1	+	The development of the site would result in a net increase of homes.
Economy	2	0	Development of the site would result in no net change to employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site would result in a loss of existing open space. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.

Objective	Criteria	AC10	Comment
Connectivity	8	+	The PTAL for the site is between 4 and 6b.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	-	The site is located within an area which exceed either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	0	The site is on previously developed land.
Heritage and townscape	13	+	The site is within 500m of heritage assets. The current site negatively impacts the wider heritage setting and development offers an opportunity to improve this.
Biodiversity and green infrastructure	14	-	Development of the site would result in a loss of existing open space which could impact habitat connectivity. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	+	The site currently has low or no ecological value and development provides an opportunity to improve biodiversity.
	16	0	The site is not located within ecologically designated sites.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	-	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	The site is not within areas of groundwater vulnerability.

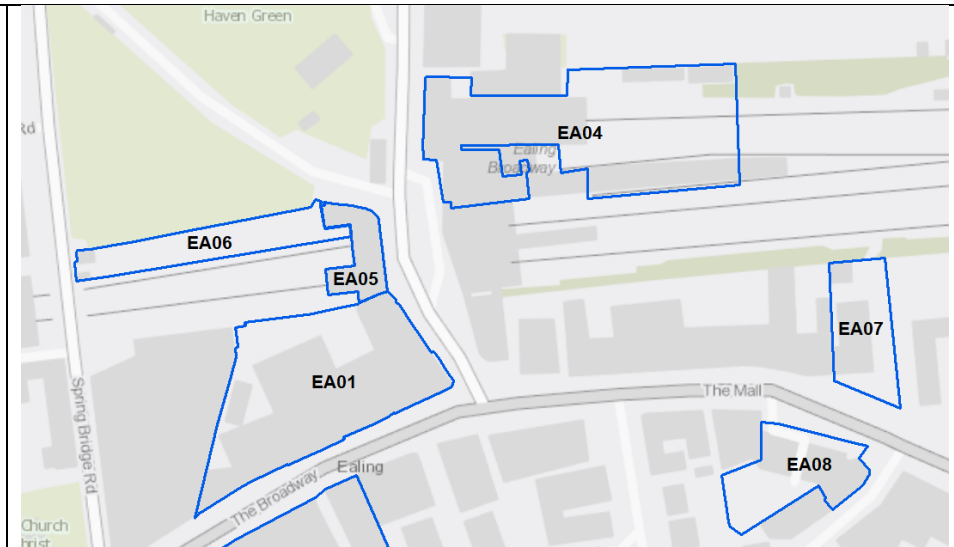


## 2. Ealing

### 2.1 Ealing Broadway (EA01, EA04, EA05, EA06, EA07, EA08)

These sites are located around Ealing Broadway Underground Station and are predominantly in retail use. The sites are largely proposed for mixed-use development (including both residential and commercial uses) apart from site EA01 which would not include residential use

The sites are located along either the A4020 or rail corridor, and so poor air quality and noise conditions should drive consideration of uses, layout and potential requirements for mitigation.



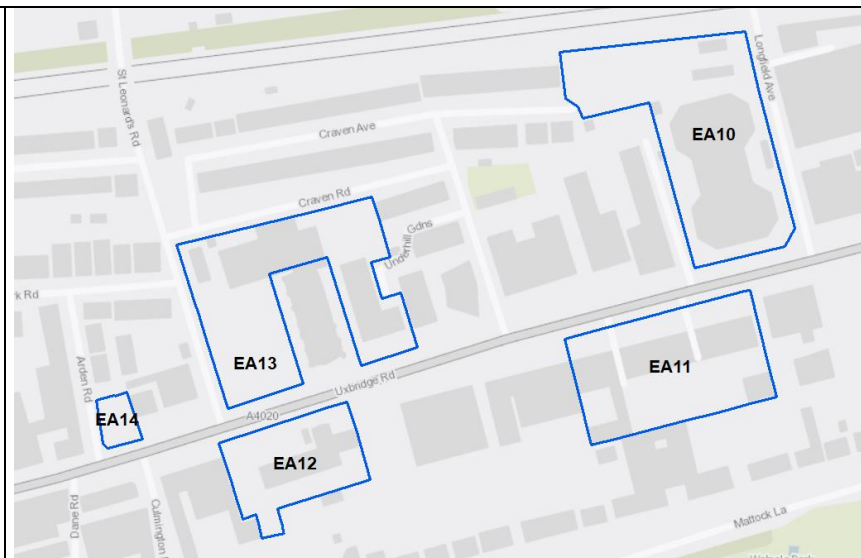
Objective	Criteria	EA01	EA04	EA05	EA06	EA07	EA08	Comment
Housing	1	0	+	+	+	+	+	Development of the sites would deliver a net increase in homes, except EA01 which does not include current or proposed residential uses.
Economy	2	?	?	?	+	0	?	EA04 currently includes Ealing Broadway Station and town centre uses which provide employment. The proposed uses will be mixed and therefore the net change in employment capacity is unknown. Development of EA06 would result in an increase in employment capacity as the current use of car parking does not provide employment uses. Development of EA07 would not result in a net change of employment capacity. Potential employment loss or gain for the remaining sites would depend on confirmation of comparative employment capacity.

Objective	Criteria	EA01	EA04	EA05	EA06	EA07	EA08	Comment
Education and skills	3	+	+	+	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	0	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	+	+	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	-	-	-	-	-	-	The sites are located within areas which exceed either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	0	+	0	0	0	+	All sites are on previously developed land. EA08 and EA04 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	-	0	0	+	+	The area contains a high level of heritage assets, and all sites are either within or directly adjoin conservation areas. EA01 and EA04 contain locally listed heritage assets which would likely be lost as part of any new development. EA08, EA01 and EA07 currently have a negative impact on the wider heritage setting and development offers an opportunity to improve this. EA05 and EA06 do not have an impact due to the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that any potential negative effects from the development of the sites are not expected.
Biodiversity and green infrastructure	14	0	+	+	+	+	0	EA08 and EA01 are in a dense urban area and do not offer opportunities for habitat connectivity. The remaining sites all offer the potential for improving habitat connectivity through proximity to open spaces along the railway corridor or at Haven Green.

Objective	Criteria	EA01	EA04	EA05	EA06	EA07	EA08	Comment
	15	+	+	+	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	0	0	0	EA04 is partially located within an ecologically designated SINC in a small area along its border with the railway however the site is in poor condition and development is unlikely to impact the local network of ecologically designated sites. The remaining sites are not located within ecologically designated sites.
Water resources	17	-	0	-	-	0	0	EA01, EA05, EA06, and EA04 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	0	0	0	0	0	0	Development of the sites is unlikely to impact flood risk.
	19	+	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 2.2 A4020 Uxbridge Road / New Broadway (EA10, EA11, EA12, EA13, EA14)

This group of sites front onto the A4020 in West Ealing and currently are a mix of predominantly commercial or office uses. EA13 and EA12 are proposed for office use. EA10, EA11 and EA14 proposed uses are for mixed-use developments including residential and commercial uses.



Objective	Criteria	EA10	EA11	EA12	EA13	EA14	Comment
Housing	1	+	+	0	0	+	Development of the sites would deliver a net increase in homes, except EA13 and EA12 which do not include current or proposed residential uses.
Economy	2	?	?	0	0	+	Development of the sites would not result in a net increase in employment capacity for EA13 and EA12, and it would result in a net increase at EA14. At EA11 and EA10 potential employment loss or gain would depend on the nature of mixed uses.
Education and skills	3	+	+	N/A	N/A	+	The sites are within 1km of an existing primary school. EA12 and EA13 are not proposed for residential use, therefore proximity to education facilities is less relevant.
	4	+	+	N/A	N/A	+	The sites are within 2km of an existing secondary school. EA12 and EA13 are not proposed for residential use, therefore proximity to education facilities is less relevant.

Objective	Criteria	EA10	EA11	EA12	EA13	EA14	Comment
Health	5	+	+	N/A	N/A	+	The sites are within 1km of an existing GP surgery. EA12 and EA13 are not proposed for residential use, therefore proximity to a GP surgery is less relevant.
	6	0	0	0	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	N/A	N/A	+	The sites are within 1.5km of a health facility. EA12 and EA13 are not proposed for residential use, therefore proximity to a health facility is less relevant.
	7b	+	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	+	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	0	0	-	EA14 is located within an area which exceeds either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . The remaining sites are partially located in areas that exceed either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	0	0	+	0	All sites are on previously developed land. EA13 and EA10 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	0	0	The sites are within 500m of heritage assets, and EA12, EA11 and EA10 adjoin conservation areas. All sites currently either have a slight negative impact on the wider heritage setting, or do not have an impact due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that any potential negative effects from the development of the sites are not expected.
Biodiversity and green infrastructure	14	+	0	0	0	0	The sites are in a dense urban area and do not offer opportunities for habitat connectivity, except EA10 which adjoins open space along the railway corridor.
	15	+	+	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.

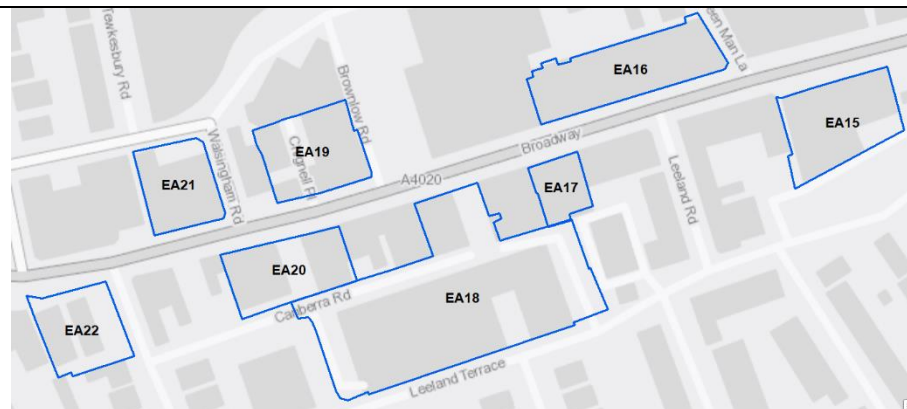
Objective	Criteria	EA10	EA11	EA12	EA13	EA14	Comment
	16	0	0	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	0	0	0	0	0	The sites are fully located within Flood Zone 1.
	18	0	0	0	0	0	Development of the sites is unlikely to impact flood risk.
	19	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 2.3 A4020 Broadway (EA15, EA16, EA17, EA18, EA19, EA20, EA21, EA22)

This group of sites front onto the A4020 in West Ealing and currently are predominantly retail uses with some commercial or residential uses on upper floors. Proposed uses are for mixed-use developments with residential and commercial (retail, office, leisure) components which will aim to optimise the sites' potential.

There are numerous local heritage assets both within the sites and the wider A4020 area, mostly relating to historic shop frontages.

The sites all experience poor noise conditions associated with the rail corridor and the A4020, and this should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	EA15	EA16	EA17	EA18	EA19	EA20	EA21	EA22	Comment
Housing	1	+	+	+	+	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	?	?	?	?	+	?	?	Development of the sites would deliver new employment capacity; however potential employment loss or gain would depend on the nature of mixed uses.
Education and skills	3	+	+	+	+	+	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	+	+	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	+	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	+	+	+	+	+	+	+	+	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	+	+	+	+	The sites are within 1.5km of a leisure facility.



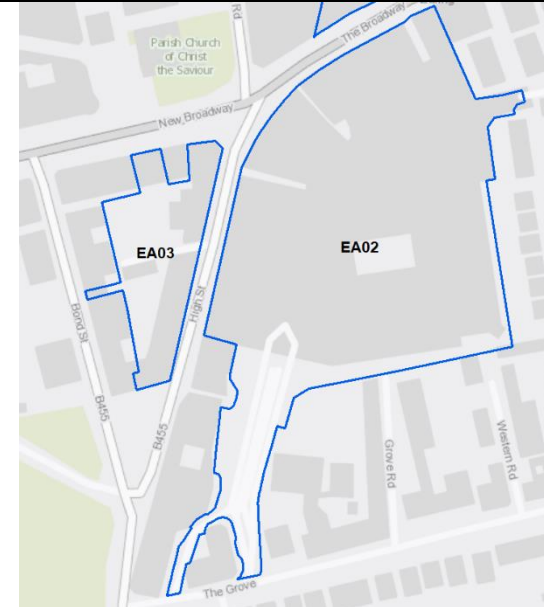
Objective	Criteria	EA15	EA16	EA17	EA18	EA19	EA20	EA21	EA22	Comment
Connectivity	8	+	+	+	+	+	+	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	+	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	-	0	0	0	0	0	EA17 is located within an area which exceeds either of the following limits: PM <sub>10</sub> 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Other sites are partially located in areas that exceed either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	-	-	-	-	-	Average noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	0	+	0	+	0	+	+	All sites are on previously developed land. EA15, EA17, EA19, EA21 and EA22 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	-	0	0	-	-	-	-	0	EA15, EA18, EA19, EA20 and EA21 contain locally listed heritage assets which would likely be lost as part of any new development. The sites are within 500m of further assets. All sites currently either have a slight negative impact on the wider heritage setting due to poor building condition, or do not have an impact due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	+	0	0	0	0	0	0	0	The sites are in a dense urban area and do not offer opportunities for habitat connectivity, except EA15 which is separated from the adjacent Dean Gardens, a small neighbourhood park, by Leeland Terrace road.
	15	+	+	+	+	+	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	0	0	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	-	0	0	0	0	0	0	The edges of sites EA15 and EA16 fall within Flood Zone 3a (surface water). As this is a small area, it is likely it could be mitigated as part of any new development. The remaining sites are within Flood Zone 1.

Objective	Criteria	EA15	EA16	EA17	EA18	EA19	EA20	EA21	EA22	Comment
	18	+	0	0	+	0	0	0	+	EA15, EA18 and EA22 offer opportunities to reduce flood risk by removing large areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the remaining sites are unlikely to impact flood risk.
	19	+	+	+	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 2.4 Ealing Broadway Shopping Centre & Crystal House (EA02) and Sandringham Mews (EA03)

These sites comprise the current Ealing Broadway Shopping Centre, and a further retail block directly across the High Street from it. The sites are proposed for mixed-use development, including both residential and commercial uses.

The sites are located along either the A4020, and so poor air quality and noise conditions should drive consideration of uses, layout and potential requirements for mitigation.



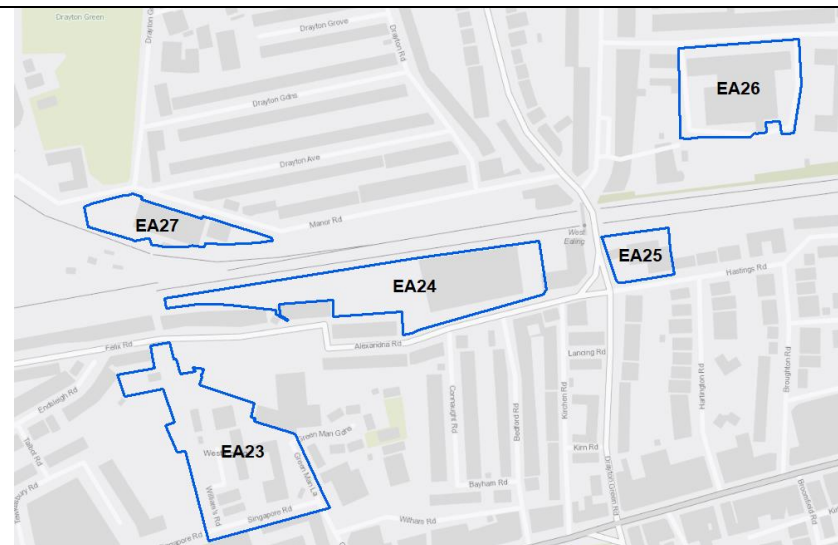
Objective	Criteria	EA02	EA03	Comment
Housing	1	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	+	Potential employment loss or gain for EA02 would depend on confirmation of comparative employment capacity. Development of EA03 would lead to a net increase of employment capacity.
Education and skills	3	+	+	The sites are within 1km of an existing primary school.
	4	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	The sites are within 1km of an existing GP surgery.

Objective	Criteria	EA02	EA03	Comment
	6	0	0	EA02 has small open spaces within the shopping centre that may be lost during development of the site and EA03 is an area of hardstanding. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	-	EA03 is located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. EA02 is partially located in an area that exceeds either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	?	?	The area contains a high level of heritage assets, and the sites are within conservation areas. The sites contain locally listed heritage assets which would likely be lost as part of any new development. The current sites are large and diverse, and contain aspects that contribute to and negatively impact the wider heritage setting. Similarly, development of the sites presents both risks and opportunities for the wider heritage setting, depending on the detailed design of the proposed developments.
Biodiversity and green infrastructure	14	0	0	The sites are in a dense urban area and do not offer opportunities for habitat connectivity.
	15	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity.
	16	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	-	The sites contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	0	0	Development of the sites is unlikely to impact flood risk.
	19	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 2.5 West Ealing (EA23, EA24, EA25, EA26, EA27)

These sites are located in the vicinity of West Ealing Station. The sites currently have a mix of uses with mix uses proposed including residential.

The sites are located along the rail corridor, and poor air quality and noise conditions should drive consideration of uses, layout and potential requirements for mitigation.



Objective	Criteria	EA23	EA24	EA25	EA26	EA27	Comment
Housing	1	+	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	+	?	?	?	?	Development of EA23 would deliver a net increase in employment capacity. Potential employment loss or gain for the remaining sites would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.

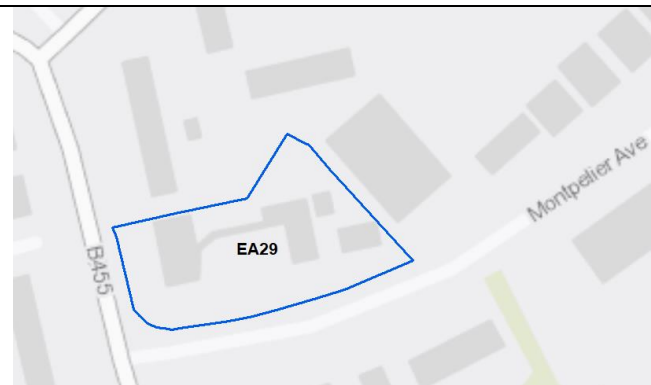
Objective	Criteria	EA23	EA24	EA25	EA26	EA27	Comment
	7a	+	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	+	+	0	The PTAL for EA27 is between 2 and 3. The PTAL for the remaining sites is between 4 and 6b.
	9	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	+	0	0	+	0	EA25, EA27, and EA24 are located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation. EA26 and EA23 are not located within areas which exceed either of these limits.
	11	-	-	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	0	+	+	+	+	All sites are on previously developed land. All sites except EA23 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	0	0	0	+	The sites are within 500m of heritage assets. EA27 and EA23 currently negatively impact the wider heritage setting and development offers an opportunity to improve this. The remaining sites do not have an impact due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that any potential negative effects from the development of the sites are not expected.
Biodiversity and green infrastructure	14	0	0	0	0	+	The sites are in a dense urban area and do not offer opportunities for habitat connectivity, except EA27 which is separated from the adjacent Drayton Green, by Manor Road.
	15	+	+	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	0	0	EA24 is partially located within an ecologically designated SINC in a small area along its border with the railway however the site is in poor condition and development is unlikely to impact the local network of ecologically designated sites. The remaining sites are not located within ecologically designated sites.
Water resources	17	-	-	0	-	-	EA27, EA26, EA23 and EA24 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.

Objective	Criteria	EA23	EA24	EA25	EA26	EA27	Comment
	18	0	0	0	0	0	Development of the sites is unlikely to impact flood risk.
	19	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.



## 2.6 Downhurst Residential Care Home (EA29)

The site is a residential care home which is proposed to be re-provided as part of any redevelopment, with intensification of the site to provide additional residential uses. Development of the site would likely result in a loss of open space.



Objective	Criteria	EA29	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	0	Site would likely result in no net change to employment capacity as the proposed care home use will be retained.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site would result in a loss of existing open space although the extent of this loss is not known at this stage. The associated grounds of the nursing home are likely to provide amenity for that residential community. The reduction of this open space and the disturbance caused by the redevelopment and introduction of additional residential uses could potentially have negative impacts. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	0	The PTAL for the site is between 2 and 3.

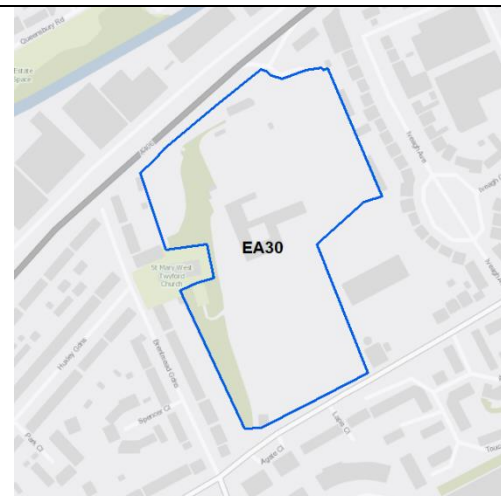
Objective	Criteria	EA29	Comment
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	+	The average road and rail noise levels of the site are less than 55db.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site could result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	0	The site currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity but any loss of current features may also need to be mitigated.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	0	The site is fully located within Flood Zone 1.
	18	-	Development of the site could result in a loss of existing open space and therefore has the potential to result in increased flood risk. However, the site also offers potential to significantly reduce flood risk, due to the current areas of hardstanding.
	19	+	The site is within an area of low groundwater vulnerability.

## 2.7 Twyford Abbey (EA30)

This large historic site is adjacent to the A406, near to the crossing point of the River Brent and two Grade II listed assets (the Abbey and Garden Wall) located alongside the Grand Union Canal and is directly adjacent to a third (St Mary's Chapel, to the west). The site is currently derelict and is proposed for housing provision.

Development of the site presents a risk of ecological and heritage impacts dependent on site design, and potential loss of open space. Due to current site access and building condition, there is also an opportunity to increase access to open space and improve heritage assets for local residents.

Poor air quality and noise conditions at the site should drive consideration of uses, layout and potential requirements for mitigation.



Objective	Criteria	EA30	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	0	Development of the site would result in no net change to employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site would result in a loss of existing open space. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.

Objective	Criteria	EA30	Comment
Connectivity	8	0	The PTAL for the site is between 2 and 3.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	-	The site is located within an area which exceeds either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	The site contains two Grade II listed heritage assets, Twyford Abbey and a Garden Wall enclosing former kitchen garden. The site is located within 500m of a conservation area and of further heritage assets. The current site negatively impacts the setting of the assets and it's likely that potential negative effects from the development of the site could be mitigated and the site could enhance the setting of the assets. Additionally, Twyford Abbey is on the Heritage at Risk Register, and development of the site provides an opportunity to improve its condition.
Biodiversity and green infrastructure	14	-	Development of the site would result in a loss of existing open space which could impact habitat connectivity.
	15	-	The site is of moderate – high ecological value. Development is likely to result in the loss of habitat with substantial mitigation likely to be required.
	16	-	The site is located within an ecologically designated SINC and development design and layout would need to be sensitive and consider measures which ensure no harm to SINC.
Water resources	17	-	The site contains areas within Flood Zone 2 or 3, and development would require specific mitigation to address this. The site also contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	-	Development of the site would result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	The site is within an area of low groundwater vulnerability.

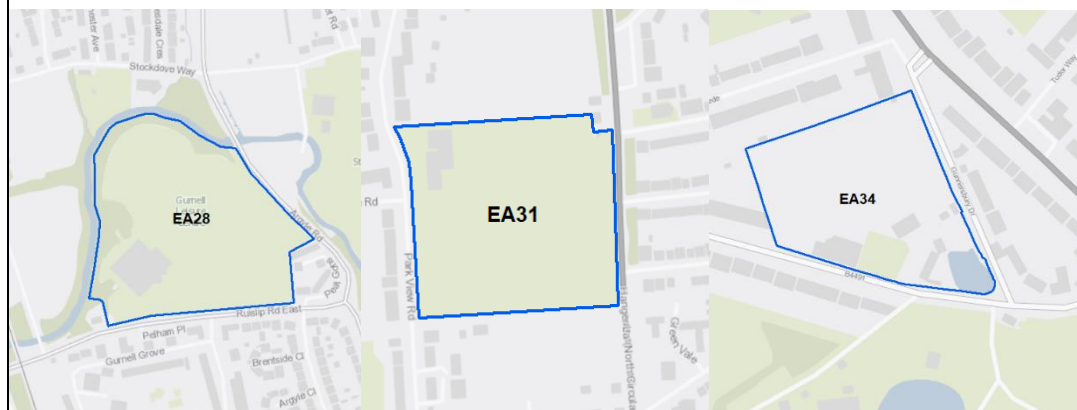
## 2.8 Ealing sports grounds (EA28, EA31, EA34)

These three leisure sites located with the Ealing sub-area comprise:

- Gurnell Leisure Centre and playing fields (EA28); and
- Former Barclays Sports Ground (EA31); and
- Old Actonians Sports Ground (EA34).

These sites are proposed to be intensified through the delivery of residential uses on-site, with some leisure uses re-provided in addition to residential components.

Development of the sites would result in a loss of open space, and presents a risk of ecological impacts, particularly at EA28 and EA31, although the extent of any impact would depend on development design.



Objective	Criteria	EA28	EA31	EA34	Comment
Housing	1	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	+	+	EA28 currently comprise leisure and sporting facilities which provide some employment. These facilities would be included as part of the proposed uses but details of comparative size are not known. New sport and leisure employment would be provided by the development of EA34 and EA31. Improved leisure facilities are likely to contribute to stronger prospects for employment retention and ability to attract additional labour force to the area.
Education and skills	3	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	The sites are within 2km of an existing secondary school.

Objective	Criteria	EA28	EA31	EA34	Comment
Health	5	+	+	+	The sites are within 1km of an existing GP surgery.
	6	-	-	-	Development of the sites would result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	+	+	The sites are within 1.5km of a health facility.
	7b	?	+	+	EA28 primarily contains leisure facilities which could be partially lost as sites are re-developed. The proposed uses include leisure facilities but details of whether the proposed provision of services will be equivalent to existing levels are not known. New sport and leisure facilities would be provided by the development of EA34 and EA31.
Connectivity	8	0	0	+	The PTAL for EA28 and EA31 is between 2 and 3, and for EA34 is between 4 and 6b.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	0	EA28 is partially located in an area that exceeds either of the following limits: PM <sub>10</sub> 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation.
	11	+	-	-	Average noise levels of EA34 and EA31 are at or above 55db. Sensitive uses may not be suitable without mitigation. The average road and rail noise levels of EA28 are less than 55db.
Resources	12	+	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	All sites are within 500m of heritage assets but do not currently impact the setting of these assets due to the nature of the sites (open spaces) their distance and the density of the townscape between sites and assets; assuming that development is of appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	-	-	-	Development of the sites would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss, and there may still be a residual impact on habitat connectivity.
	15	-	-	-	All sites have a mix of areas of lower and higher ecological value present, including riverbank at EA28 and a nature pond at EA31. Development of the sites could result in the loss of existing areas of moderate or high ecological value and where this occurs substantial mitigation is likely to be required.
	16	-	0	0	EA28 is partially located within an ecologically designated SINC. EA34 and EA31 are not located within ecologically designated sites.

Objective	Criteria	EA28	EA31	EA34	Comment
Water resources	17	-	-	-	EA28 contains areas within Flood Zone 2 or 3, and development would require specific mitigation to address this. All sites contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	-	-	-	Development of the sites would result in a loss of existing open space and therefore has the potential to result in increased flood risk.
	19	0	0	+	EA28 and EA31 are within an area of medium-low groundwater vulnerability. EA34 is within an area of low groundwater vulnerability.



## 2.9 96 Queens Drive & Telephone Service Centre (EA32)

This site is to the north and south of North Ealing Station. Current uses are commercial the site is proposed for residential provision.

EA32 is located between two rail corridors and the A406, and so poor air quality and noise should drive consideration of uses, layout and potential requirements for mitigation.



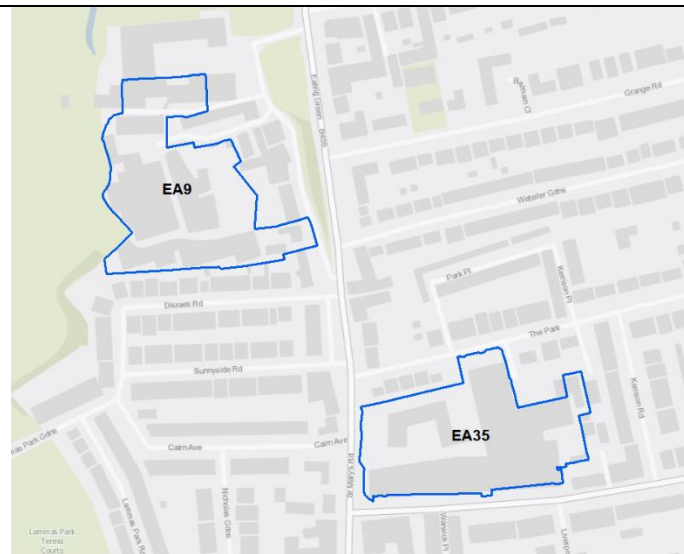
Objective	Criteria	EA32	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	?	Potential employment loss or gain for EA32 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	0	There would be no loss of open space from development of the site. There may be opportunities to provide new open space dependent on the design of proposed development.

Objective	Criteria	EA32	Comment
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	+	The PTAL is between 4 and 6b.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	-	The site is located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels are at or above 55db. Sensitive uses may not be suitable without mitigation. .
Resources	12	+	Site is on previously developed land. EA32 is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	+	The site offers the potential for improving habitat connectivity through proximity to open spaces along the railway corridor.
	15	+	The site currently has low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	The site is not located within ecologically designated sites.
Water resources	17	0	The site is fully located within Flood Zone 1.
	18	0	Development of the site is unlikely to impact flood risk.
	19	+	The site is either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 2.10 Ealing Studios (EA09) and University of West London (EA35)

These two sites near to Walpole Park currently provide higher education (EA35) and creative industrial (EA09) uses. Development of EA35 would deliver residential capacity through intensification of the site and will re-provide some of the existing education uses, EA09 would re-provide creative industrial and commercial uses with the addition of enabling residential uses.

The sites generally experience poor air quality, and this should drive consideration of uses, layout and potential requirements for mitigation.



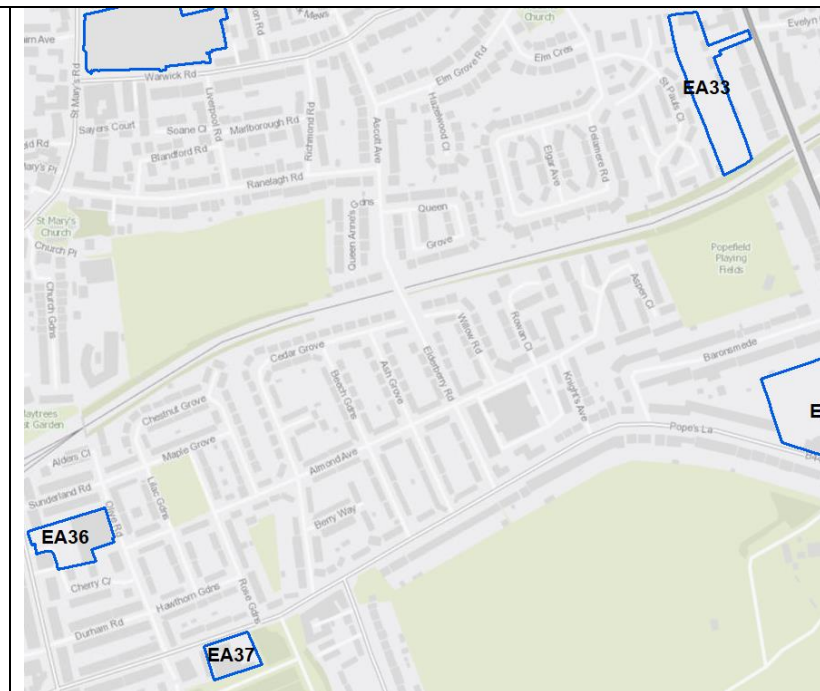
Objective	Criteria	EA09	EA35	Comment
Housing	1	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	0	0	Development of the sites would likely not result in a net change of employment capacity.
Education and skills	3	+	+	The sites are within 1km of an existing primary school.
	4	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	The sites are within 1.5km of a health facility.

Objective	Criteria	EA09	EA35	Comment
	7b	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	0	The PTAL for EA35 is between 2 and 3. The PTAL for the EA09 is between 4 and 6b.
	9	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	The sites are partially located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation.
	11	+	+	The average road and rail noise levels of the sites are less than 55db.
Resources	12	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	0	The sites are within a conservation area. EA35 contains a locally listed heritage asset which would likely be lost as part of any new development. The current sites are large and diverse, and contain aspects that contribute to and negatively impact the wider heritage setting. Similarly, development of the sites presents both risks and opportunities for the wider heritage setting, depending on the detailed design of the proposed developments.
Biodiversity and green infrastructure	14	+	0	EA09 offers the potential for improving habitat connectivity through proximity to open spaces at Walpole Park. EA35 does not offer opportunities for habitat connectivity.
	15	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	-	The sites contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	0	0	Development of the sites is unlikely to impact flood risk.
	19	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 2.11 South Ealing (EA33, EA36 and EA37)

These sites in South Ealing have a mix of current uses and are proposed for housing provision. Development of EA33 would deliver residential uses with retention of green space with the riding school either reaccommodated on site or re-provided elsewhere in the borough.

EA33 and EA37 experience poor air quality and noise conditions, and this should drive consideration of uses, layout and potential requirements for mitigation.



Objective	Criteria	EA33	EA36	EA37	Comment
Housing	1	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	0	-	-	EA33 currently comprises leisure (horse riding) facilities which provide employment opportunities. The site would result in a net loss of employment capacity under a fully residential scheme. Development of EA33 would not result in a change of employment capacity. Development of EA37 and EA36 would lead to a net loss of employment capacity.
Education and skills	3	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	The sites are within 2km of an existing secondary school.

Objective	Criteria	EA33	EA36	EA37	Comment
Health	5	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	The sites are within 1.5km of a health facility.
	7b	-	+	+	EA33 currently comprises specialist leisure facilities that would be lost under a fully residential scheme. The remaining sites are within 1.5km of a leisure facility.
Connectivity	8	-	0	0	The PTAL for EA33 is between 1a and 2, the other sites are between 2 and 3.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	0	The sites are partially located within areas which exceed either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	+	-	Average road and rail noise levels of the sites are at or above 55db, except for EA36. Sensitive uses may not be suitable without mitigation.
Resources	12	0	+	+	All sites are on previously developed land. EA37 and EA36 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	The sites are within 500m of heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	+	0	+	EA37 and EA33 offer the potential for improving habitat connectivity through proximity to open spaces at the adjacent graveyard and park. EA36 does not offer opportunities for habitat connectivity.
	15	0	+	+	EA37 and EA36 currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	0	0	0	The sites are fully located within Flood Zone 1.

Objective	Criteria	EA33	EA36	EA37	Comment
	18	0	0	0	Development of the sites is unlikely to impact flood risk.
	19	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 3. Greenford

### 3.1 Stanhope Primary School (GR03) and Windmill Nursery Centre (GR06)

These two sites currently provide education facilities, which are proposed to be retained as part of site intensification to include residential use. Development of the sites would likely result in a loss of open space.



Objective	Criteria	GR03	GR06	Comment
Housing	1	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	?	Potential employment loss or gain for the sites would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	GR03 currently includes a primary school which is proposed to be retained, although further details including of comparative size and education provision are not yet confirmed. GR06 is within 1km of an existing primary school.



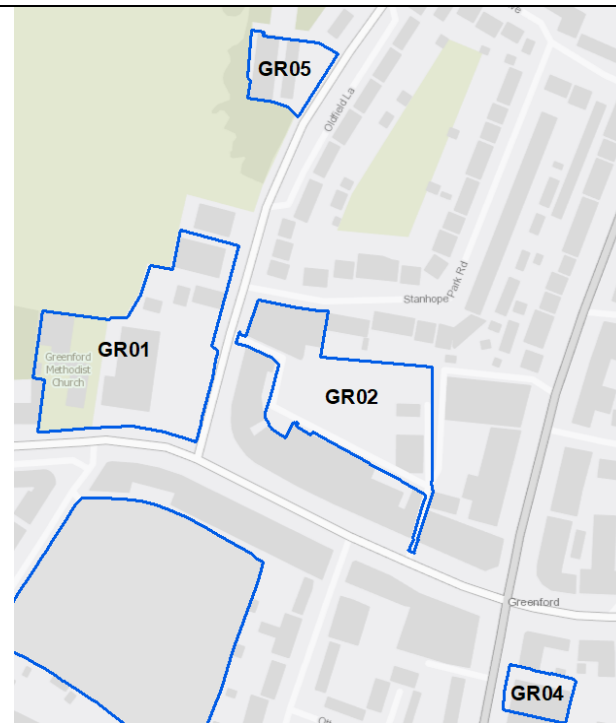
Objective	Criteria	GR03	GR06	Comment
	4	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	Development of the sites could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	+	GR03 is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation. GR06 is not located within an area which exceeds either of these limits.
	11	+	+	The average road and rail noise levels of the sites are less than 55db.
Resources	12	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	The sites are within 500m of heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	0	0	Development of the sites could result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage, this likely to be to a lesser extent at GR06. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	0	0	The sites currently have low overall ecological value however there are some ecological features present. Development of the sites provides an opportunity to improve biodiversity but any loss of current features may also need to be mitigated.
	16	0	0	The sites are not located within ecologically designated sites.
Water resources	17	0	0	The sites are fully located within Flood Zone 1.

Objective	Criteria	GR03	GR06	Comment
	18	-	-	Development of the sites could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	0	GR06 is within an area of medium groundwater vulnerability. Greenford 001 within an area of low groundwater vulnerability.

### 3.2 Greenford south (GR01, GR02, GR04, GR05)

These sites, near to Ravenor Park in the south of Greenford, have a range of current uses, and are all proposed for mixed-use development with residential and commercial and retail components.

Development of GR05 and GR01 could result in the loss of small areas of open space. There is no open space to be lost as part of GR02. The sites experience poor air quality, and for GR04 and GR02 poor noise conditions, and this should drive consideration of uses, layout and potential requirements for mitigation.



Objective	Criteria	GR01	GR02	GR04	GR05	Comment
Housing	1	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	+	?	-	Potential employment loss or gain for GR04 and GR01 would depend on comparative employment capacity. Development of GR05 would result in a net decrease of employment capacity, whereas development of GR02 would result in a net increase.
Education and skills	3	+	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	+	The sites are within 2km of an existing secondary school.

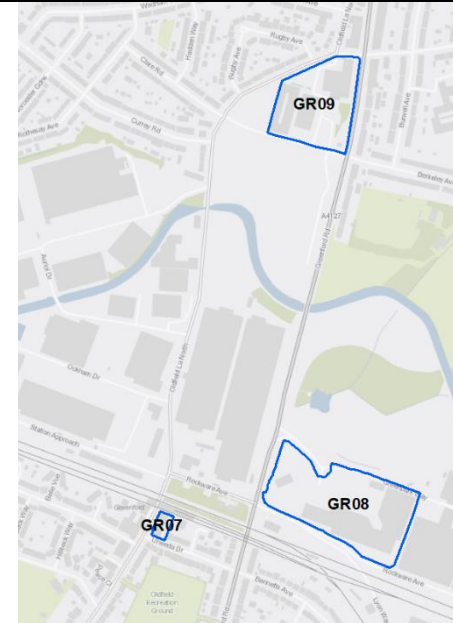
Objective	Criteria	GR01	GR02	GR04	GR05	Comment
Health	5	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	-	0	0	0	Development of GR01 could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss. Development of GR05 could result in the loss of open space. There would be no loss of open space from development of the remaining sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	0	0	The sites are partially located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation.
	11	+	-	-	+	Average road and rail noise levels of GR04 and GR02 are at or above 55db. Sensitive uses may not be suitable without mitigation. The average road and rail noise levels of GR05 and GR01 are less than 55db.
Resources	12	+	+	+	0	All sites are on previously developed land. All sites except GR05 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	-	+	0	0	GR01 contains three heritage assets, the Grade II Listed Greenford War Memorial and two locally listed buildings. The locally listed assets would likely be lost as part of any new development. The remaining sites are within 500m of heritage assets. GR05, GR04 and GR02 do not currently impact the setting of assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	-	0	0	-	Development of GR05 and 005 could result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity. The remaining sites do not offer opportunities for habitat connectivity.
	15	-	+	+	0	Development of the GR01 could result in the loss of existing areas of moderate or high ecological value and where this occurs substantial mitigation is likely to be required. GR05 currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity but any

Objective	Criteria	GR01	GR02	GR04	GR05	Comment
						loss of current features may also need to be mitigated. The remaining sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	0	0	0	0	The sites are fully located within Flood Zone 1.
	18	-	+	0	-	Development of GR05 and GR01 could result in the loss of existing open space and therefore has the potential to result in increased flood risk. However, development of Greenford 005 also offers opportunities, along with GR02, to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the GR04 is unlikely to impact flood risk.
	19	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

### 3.3 Greenford north (Greenford – GR07, GR08, GR09)

These sites, near to Horsenden Hill in the north of Greenford, have a range of current uses. GR07 and GR09 have been proposed for mixed use schemes which include residential, commercial and community elements. GR08 has been proposed for a mix of retail and industrial use with retention of parking.

Development of GR09 is likely to result in the loss of open space. The sites experience poor air quality and noise, and this should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	GR07	GR08	GR09	Comment
Housing	1	+	0	+	Development of GR07 and GR09 would deliver a net increase in homes. Development of GR08 does not include residential use.
Economy	2	?	0	+	Development of GR09 would result in an increase in employment capacity. Potential employment loss or gain for GR07 would depend on confirmation of comparative employment capacity. Development of GR08 would not result in a change of employment capacity.
Education and skills	3	+	N/A	+	The sites are within 1km of an existing primary school. GR08 is not proposed for residential use, therefore proximity to education facilities is less relevant.
	4	+	N/A	+	The sites are within 2km of an existing secondary school. GR08 is not proposed for residential use, therefore proximity to education facilities is less relevant.

Objective	Criteria	GR07	GR08	GR09	Comment
Health	5	+	N/A	+	The sites are within 1km of an existing GP surgery. GR08 is not proposed for residential use, therefore proximity to GP surgery is less relevant.
	6	0	0	-	Development of GR09 is assumed to result in the loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss. There would be no loss of open space from development of the remaining sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	N/A	+	The sites are within 1.5km of a health facility. GR08 is not proposed for residential use, therefore proximity to health facility is less relevant.
	7b	+	N/A	+	The sites are within 1.5km of a leisure facility. GR08 is not proposed for residential use, therefore proximity to leisure facility is less relevant.
Connectivity	8	+	+	0	The PTAL for GR09 is between 2 and 3. The PTAL for the remaining sites is between 4 and 6b.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	0	The sites are partially located within areas which exceed either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	0	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation. GR08 is proposed for retail and industrial uses which would not be considered sensitive.
Resources	12	0	+	+	All sites are on previously developed land. GR08 and GR09 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	+	-	GR09 contains a locally listed asset which would likely be lost as part of any new development. All sites are within 500m of further heritage assets. Development of sites GR07 and GR08 offers an opportunity to improve the setting of existing heritage assets.
Biodiversity and green infrastructure	14	+	+	-	Development of GR09 would likely result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. The remaining sites offer the potential for improving habitat connectivity through proximity to open spaces along the railway corridor or at Horsenden Hill.

Objective	Criteria	GR07	GR08	GR09	Comment
	15	+	+	-	Development of the GR09 could result in the loss of existing areas of moderate or high ecological value and where this occurs substantial mitigation is likely to be required. The remaining sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	0	-	-	GR08 and GR09 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. GR07 is fully located within Flood Zone 1.
	18	0	+	-	Development of GR09 could result in the loss of existing open space and therefore has the potential to result in increased flood risk. However, development for GR09 also offers opportunities, along with GR08, to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of GR07 is unlikely to impact flood risk.
	19	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.



### 3.4 Smiths Farm and Allendale (GR10)

This site near to the A40 currently provides industrial uses, and is proposed as a mixed-use scheme to include some commercial uses.

The site experiences poor air quality and noise conditions which should drive consideration of uses and potential requirements for mitigation. The site has poor public transport connectivity.



Objective	Criteria	GR10	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	?	Potential employment loss or gain for GR10 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	0	There would be no loss of open space from development of the site. There may be opportunities to provide new open space dependent on the design of proposed development.

Objective	Criteria	GR10	Comment
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	-	The PTAL for the site is between 0 and 1b and mitigation may be required.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	-	The site contains a locally listed heritage asset which would likely be lost as part of any new development. The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	+	The site offers the potential for improving habitat connectivity through proximity to open spaces
	15	+	The site currently has low or no ecological value and development provides an opportunity to improve biodiversity.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	0	The site is fully located within Flood Zone 1.
	18	+	Development of the site offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	+	The site is not within an area of groundwater vulnerability.

## 4. Hanwell

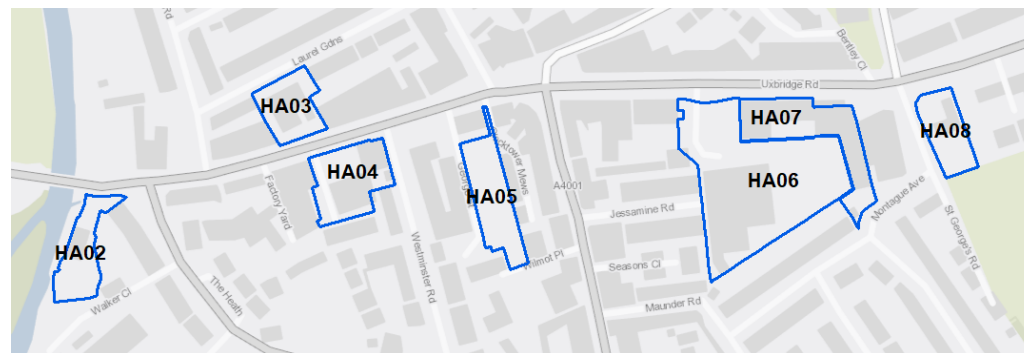
### 4.1 Hanwell Town Centre (HA02, HA03, HA04, HA05, HA06, HA07, HA08,)

This group of sites front onto the A4020 in Hanwell and together currently comprise a mix of uses. Proposed uses for each site are for mixed-use developments with residential components, with the exception of HA02 which has been proposed for residential only.

Development of HA08 may result in the loss of open space. The other sites do not contain open space.

The sites all experience poor air quality and noise conditions associated with the A4020, and this should drive consideration of uses and potential requirements for mitigation.

Due to proximity to the River Brent HA02 contains areas of fluvial flood risk and mitigation would be required, especially as the site is proposed for a residential development which is a sensitive use.



Objective	Criteria	HA02	HA03	HA04	HA05	HA06	HA07	HA08	Comment
Housing	1	+	+	+	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	-	?	?	+	?	?	+	HA02 currently provides retail employment. Development of this site would therefore result in a net loss of employment capacity under the proposed fully residential scheme. HA08 is currently in residential use and therefore a mixed use development would result in an increase to employment capacity. Development of HA05 which is currently a car park would lead to a net increase of employment capacity. Potential employment loss or gain for the remaining sites would depend on confirmation of comparative employment capacity.

Objective	Criteria	HA02	HA03	HA04	HA05	HA06	HA07	HA08	Comment
Education and skills	3	+	+	+	+	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	+	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	0	0	0	-	Development of HA08 could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss. There would be no loss of open space from development of the remaining sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	+	+	+	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	-	0	-	0	0	HA06 and HA04 are located within areas which exceed either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. The remaining sites are partially located within areas which exceed either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	-	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	+	0	+	+	+	All sites are on previously developed land. All sites except HA05 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	+	+	+	+	+	+	HA02 is located within a conservation area and is within 500m of further heritage assets. The current site negatively impacts the setting of the assets and it's likely that any potential negative effects from the development of the site could be mitigated and the site could enhance the setting of the asset. The remaining sites are within 500m of heritage assets. All sites currently either have a slight negative impact on the wider heritage setting due to poor building condition, or do not have an impact due to their distance and the density of the townscape between sites and assets. Assuming that development is of similar or appropriate massing, it is

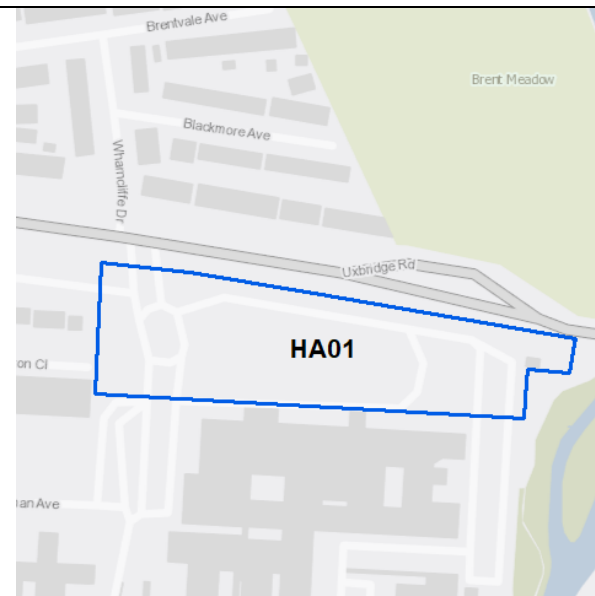
Objective	Criteria	HA02	HA03	HA04	HA05	HA06	HA07	HA08	Comment
									likely that potential negative effects from development could be mitigated and developing the sites may have positive effects on the setting.
Biodiversity and green infrastructure	14	+	0	0	0	0	0	+	The sites are in a dense urban area and do not offer opportunities for habitat connectivity, except HA02 which adjoins open space along the river and HA08 which is adjacent to green space.
	15	+	+	+	+	+	+	0	HA08 currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated. The remaining sites currently have low or no ecological value and development provides an opportunity to improve biodiversity through biodiversity net gain, albeit at a small scale.
	16	0	0	0	0	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	0	-	-	0	0	0	HA02 contains areas within Flood Zone 2 or 3, and development would require specific mitigation to address this. HA05 and HA04 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	+	0	+	0	+	0	-	Development of HA08 could result in the loss of existing open space and therefore has the potential to result in increased flood risk. Development of HA06, HA02 and HA04 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the remaining sites is unlikely to impact flood risk.
	19	+	+	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 4.2 Ealing Hospital (HA01)

This site comprises Ealing Hospital car park. The proposed use of the site is housing provision, with some car parking for the hospital re-provided. Other parts of the original hospital site directly to the south and west of HA01 have already been redeveloped to provide housing.

The site experiences poor air quality and noise conditions which should be considered where there is proposed residential use along with potential requirements for mitigation.

Due to proximity to the River Brent the site contains areas of fluvial flood risk and mitigation would be required. The site is located in an area of higher groundwater vulnerability and measures to avoid or mitigate impacts may be required.



Objective	Criteria	HA01	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	0	Development of the site would result in no change in employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	0	There is no existing open space on-site at the moment. There may be opportunities to provide new open space dependent on the design of proposed development. Development of HA01 is unlikely to change the provision of open space on site.

Objective	Criteria	HA01	Comment
	7a	+	This site is within 1.5km of a healthcare facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	+	The PTAL for the site is between 4 and 6b.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	The site contains a heritage asset, the Grade II listed St Bernard's hospital building, is partially located within a conservation area and is located adjacent to further listed assets. The St Bernard's hospital building is on the Heritage at Risk Register and overall the current site negatively impacts the wider heritage setting. Sensitive development offers an opportunity to address this.
Biodiversity and green infrastructure	14	+	The site offers potential for improving habitat connectivity through proximity to open spaces along the River Brent.
	15	+	The site currently has low to no overall ecological value. Development of the currently hardstanding site provides an opportunity to improve biodiversity.
	16	+	HA01 is a large site located adjacent to an ecologically designated sites along its border with the river. The site is in poor condition and development offers opportunities for improving the local network of ecologically designated sites.
Water resources	17	-	The site contains areas within Flood Zone 2 or 3, and development would require specific mitigation to address this. The site also contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	+	Development of the site offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	-	The site is within an area of high groundwater vulnerability.

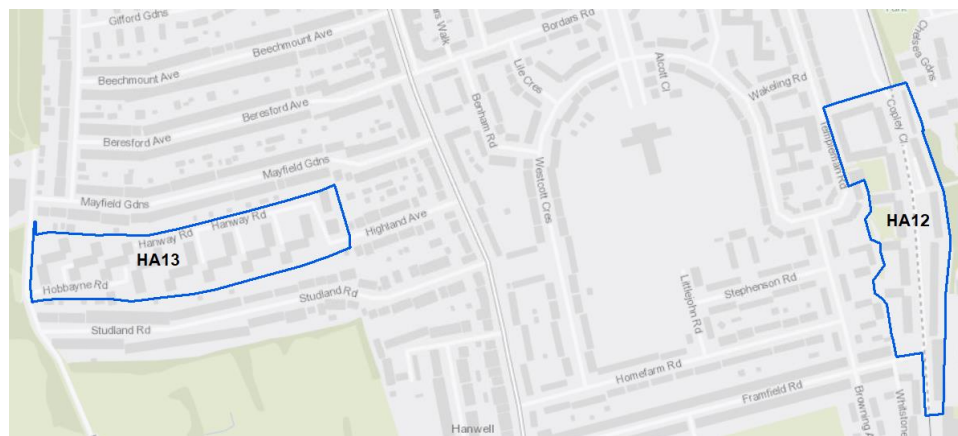
### 4.3 High Lane Housing Estate (HA13) and Copley Close Estate (HA12)

These two sites comprise housing estates in central Acton. Both estates are characterised by low rise blocks, interspersed with limited open green space.

Proposed uses are for the intensification of housing provision on both sites with some mixed uses including retail and community uses. Development is assumed to result in reduced open space available within the estates.

HA12 experiences poor noise conditions, and this should drive consideration of uses and potential requirements for mitigation.

Due to proximity to the River Brent, HA13 contains small areas of fluvial flood risk and mitigation would be required.



Objective	Criteria	HA12	HA13	Comment
Housing	1	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	+	+	Development of the sites would result in a net increase in employment capacity.
Education and skills	3	+	+	The sites are within 1km of an existing primary school.
	4	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	The sites are within 1km of an existing GP surgery.
	6	?	?	There could be a loss of small areas of open space from development of these large sites. There may be opportunities to re-provide or improve open space dependent on the design of proposed developments.
	7a	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	The sites are within 1.5km of a leisure facility.



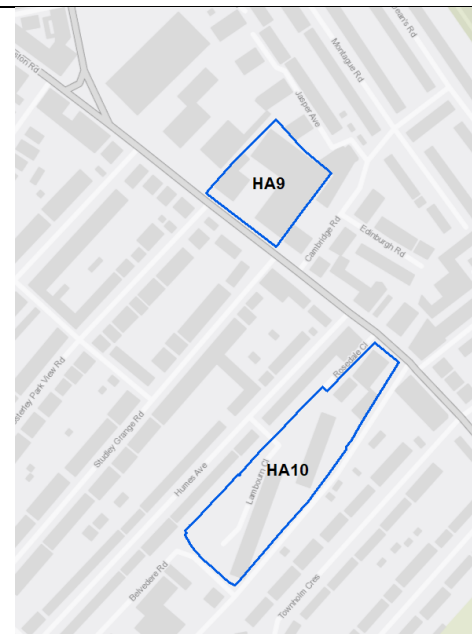
Objective	Criteria	HA12	HA13	Comment
Connectivity	8	0	0	The PTAL for the sites is between 2 and 3.
	9	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	+	+	The sites are not located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> .
	11	-	+	Average road and rail noise levels of HA12 are at or above 55db. Sensitive uses may not be suitable without mitigation. The average road and rail noise levels of the site are less than 55db.
Resources	12	0	+	All sites are on previously developed land. HA13 is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	The sites are within 500m of heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	+	+	The sites offer the potential for improving habitat connectivity through proximity to open spaces at the River Brent corridor (HA13) and Copley Wood (HA12).
	15	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	-	HA13 contains areas within Flood Zone 2 or 3, and development would require specific mitigation to address this. HA13 and HA12 also contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	0	0	Development of the sites is unlikely to impact flood risk.
	19	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

#### 4.4 Tile Depot & Lambourn Close (HA10) and Access Storage (HA09)

HA10 is largely occupied by residential uses. To the north of the site is a tile showroom and builder's merchants. HA09 comprises of a self-storage warehouse facility.

Proposed uses are for the intensification of housing provision on both sites with some employment uses on HA09.

The sites generally experience poor air quality and noise conditions which should inform future uses and potential mitigation.



Objective	Criteria	HA09	HA10	Comment
Housing	1	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	0	Potential employment loss or gain for HA09 would depend on confirmation of comparative employment capacity. The development of HA10 would result in no net change to employment capacity.
Education and skills	3	+	+	The sites are within 1km of an existing primary school.
	4	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	There would be no loss of open space from development of the remaining sites. There may be opportunities to provide new open space dependent on the design of proposed developments.

	7a	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	0	0	The PTAL for the sites is between 2 and 3.
	9	0	0	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	The sites are partially located within areas which exceed either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	-	Average road and rail noise levels at both sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	HA10 is located within 500m of a conservation area (Canalside) and heritage assets. The current site does not impact the setting of the assets and it's likely that potential negative effects from the development of the site could be mitigated. HA09 located within 500m of heritage assets. The current site does not impact the setting of the assets and it's likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	0	0	The sites are in a dense urban area and do not offer opportunities for habitat connectivity
	15	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	The sites are not located within ecologically designated sites.
Water resources	17	0	-	HA10 contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. HA09 is located within Flood Zone 1
	18	+	-	Development of HA10 could result in the loss of existing open space and therefore has the potential to result in increased flood risk. Development of HA09 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	0	0	Both sites are within an area of medium groundwater vulnerability.

## 4.5 Evershed Sports Ground (HA11)

This site located along the River Brent comprises Evershed Sports Ground, which is permanently closed. The proposed site will remain for leisure use.

Development of the site could result in a loss of open space.

The site experiences poor noise conditions, and this should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	HA11	Comment
Housing	1	0	The site would not deliver new homes
Economy	2	+	As the sports ground is currently closed, it is likely that developing a new leisure facility will offer new employment opportunities.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site would result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.

Objective	Criteria	HA11	Comment
	7a	+	The sites are within 1.5km of a health facility.
	7b	+	The site is within 1.5km of leisure facilities.
Connectivity	8	0	The PTAL for the site is between 2 and 3.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	+	The site is not located within an area which exceeds either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> .
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation. The site is proposed for leisure uses which would not be considered sensitive.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that any potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site could result in a loss of existing open space which could impact habitat connectivity. However, development of the site offers the opportunity to improve the overall ecological value of the sports ground.
	15	0	The site currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity through biodiversity net gain, but any loss of current features may also need to be mitigated.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	0	The site is fully located within Flood Zone 1.
	18	-	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	0	The site is within an area of medium-low groundwater vulnerability.

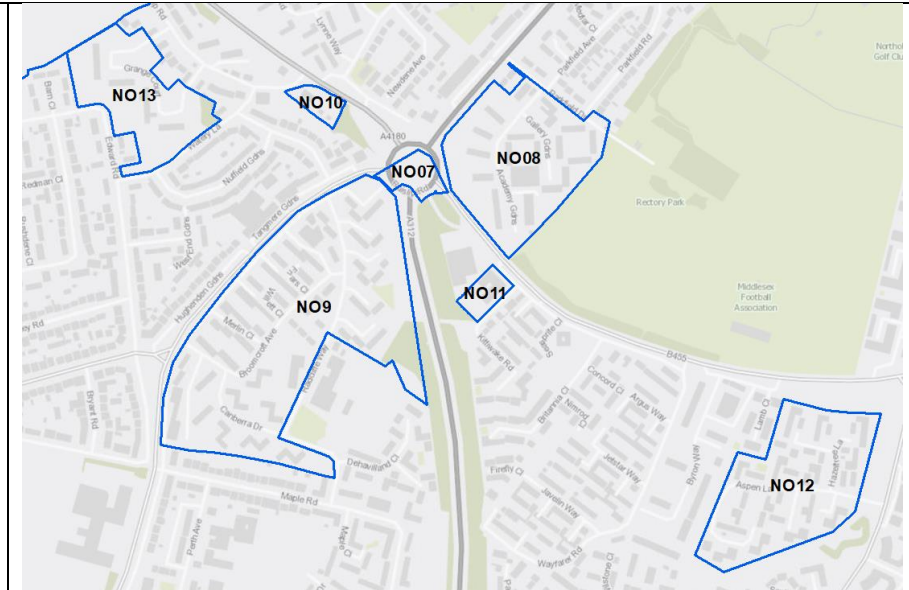
## 5. Northolt

### 5.1 White Hart Roundabout (NO07, NO08, NO09, NO10, NO11, NO12, NO13)

These sites predominantly comprise housing estates near to the White Hart Roundabout, and also the central reservation of the roundabout and two small utilities sites. The estates are characterised by low rise apartment blocks and terraced housing, interspersed with open green space.

Proposed uses are for the intensification of housing provision with NO11, NO09, NO08 and NO07 are also to include some commercial uses, which would be likely to result in a loss of open space.

Some sites experience poor air quality and noise conditions associated with the roundabout and connecting roads, and this should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	NO07	NO08	NO09	NO10	NO11	NO12	NO13	Comment
Housing	1	+	+	+	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	+	+	+	0	?	0	0	Development of NO12, NO10 and NO13 would result in no net change to employment capacity. Development of NO09, NO08 and NO07 would result in a net increase of employment capacity. Potential employment loss or gain for NO11 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	+	+	+	+	+	The sites are within 1km of an existing primary school.

Objective	Criteria	NO07	NO08	NO09	NO10	NO11	NO12	NO13	Comment
	4	+	+	+	+	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	-	-	0	0	-	-	Development of NO12, NO09, NO08 and NO13 could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss. NO07 is currently an underpass at White Hart Roundabout and the loss of this open space is unlikely to have any negative impacts on health determinants. NO10 includes a small area of open space which would be lost; however, this is not publicly accessible. There would be no loss of open space from development of NO11. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	0	0	0	0	0	0	0	The PTAL for the sites is between 2 and 3.
	9	+	+	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	-	0	0	0	0	+	+	NO07 is located within an area which exceeds either of the following limits: PM10 30µg/m <sup>3</sup> . NO <sub>2</sub> 30µg/m <sup>3</sup> . NO11, NO09, NO08 and NO10 are partially located within areas which exceed either of these limits. Sensitive uses may not be suitable without mitigation. NO12 and NO13 are not located within areas which exceed either of these limits.
	11	-	-	-	-	-	+	+	Average road and rail noise levels of the sites are at or above 55db, except for NO12 and NO13. Sensitive uses may not be suitable without mitigation.
Resources	12	0	+	+	+	+	+	+	All sites are on previously developed land. All sites except NO07 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	0	0	0	0	All sites are within 500m of heritage assets. NO08 and 039 currently negatively impact the setting of assets and, although it's likely that the development could remove these impacts, due to the major roundabout that dominates the sites it is unlikely that any form of development could enhance the setting. The remaining sites do not currently impact the setting of assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.

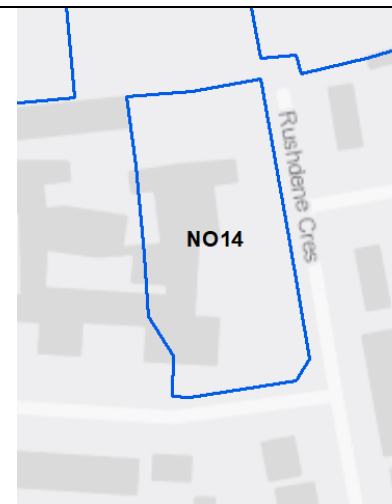
Objective	Criteria	NO07	NO08	NO09	NO10	NO11	NO12	NO13	Comment
Biodiversity and green infrastructure	14	0	-	-	-	+	-	-	Development of all sites except NO11 and NO07 could result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity. NO11 offers the potential for improving habitat connectivity through proximity to open spaces along the woodland buffer to the A312 on one side of the site and at Rectory Park on the other side. Development of NO07 has limited potential to improve habitat connectivity as the site is the central reservation of a busy roundabout.
	15	+	+	+	+	+	+	+	All sites have low overall ecological value however there are some ecological features present. Development of these sites provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated.
	16	0	0	0	0	0	0	0	NO09 is partially located within an ecologically designated SINC in a small area along its border with the verge of the A312 however the site is in poor condition and development is unlikely to impact the local network of ecologically designated sites. The remaining sites are not located within ecologically designated sites.
Water resources	17	-	-	-	-	0	-	-	All sites, excepting NO11 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. NO11 is fully located within Flood Zone 1.
	18	-	-	-	-	+	-	-	Development of all sites except for NO11 could result in the loss of existing open space and therefore has the potential to result in increased flood risk. Development of NO11 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	+	+	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.



## 5.2 Northolt Grange Community Centre & St Raphael's Primary School (NO14)

This site is comprised of a community centre and part of a primary school and is proposed as housing provision with public open space.

The site has poor public transport connectivity.



Objective	Criteria	NO14	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	-	Development of the site would result in a net decrease to employment capacity.
Education and skills	3	0	The site contains part of a primary school which may be lost under any development. There is another existing primary school within 1km.
	4	+	The site is within 2 km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	+	Development of the site would result in new public open space delivery.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.

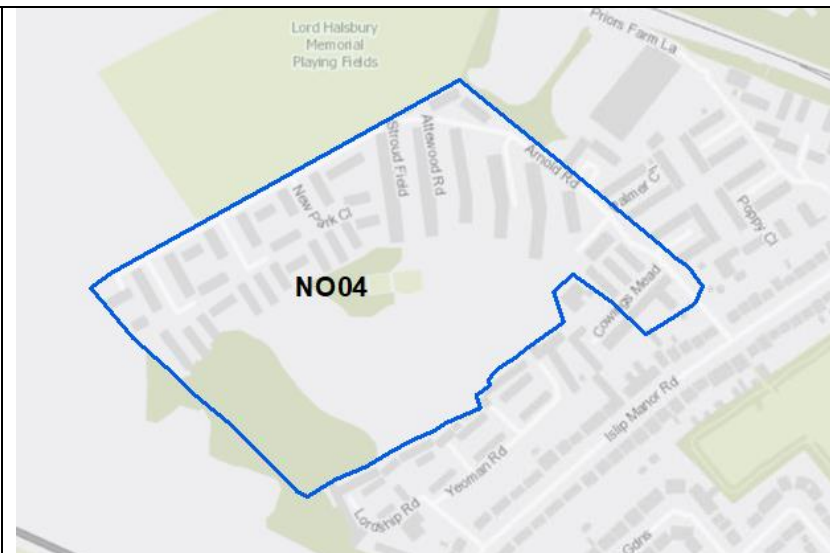
Objective	Criteria	NO14	Comment
Connectivity	8	-	The PTAL for the site is between 0 and 1b and mitigation may be required.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	+	The site is not located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³.
	11	+	The average road and rail noise levels of the site are less than 55db.
Resources	12	0	The site is on previously developed land but has no known contamination issues.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	+	The site offers the potential for improving habitat connectivity through the implementation of proposed public open space connecting to the existing to Down Way Park.
	15	+	The site currently has low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	0	The site is fully located within Flood Zone 1.
	18	0	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk. Development of the site would result in new public open space delivery and therefore may offer limited potential to reduce flood risk.
	19	+	The site is not within an area of groundwater vulnerability.

### 5.3 Islip Manor Housing Estate (NO04)

This site comprises a housing estate characterised by low rise blocks of apartments and terraced houses, interspersed with small open spaces and with a large adjacent area of open green space accounting for around 50% of the site.

Proposed uses are for the intensification of housing provision, which would be likely to result in a decrease in the open space available to the estate, and presents a risk of ecological impacts, although the extent of any impact would depend on development design.

The site experiences poor noise conditions, and this should drive consideration of uses and potential requirements for mitigation.

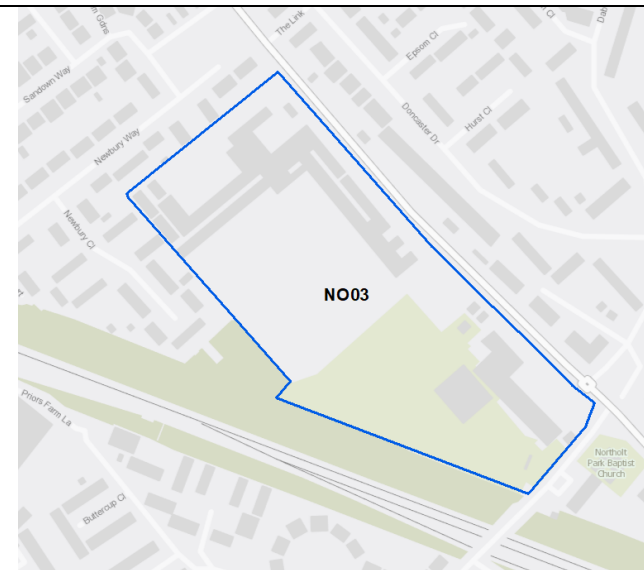


Objective	Criteria	NO04	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	0	Development of the site would result in no net change to employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site is likely to result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.

Objective	Criteria	NO04	Comment
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	-	The PTAL for the site is between 0 and 1b and mitigation may be required.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	+	The site is not located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site could result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	-	Development of the site could result in the loss of existing areas of moderate or high ecological value and where this occurs substantial mitigation is likely to be required.
	16	-	The site is partially located within an ecologically designated SINC and development design and layout would likely need to be sensitive and consider measures which ensure no harm to SINC.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	-	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	The site is not within an area of groundwater vulnerability.

## 5.4 Northolt High School (NO03)

The site currently provides education facilities, which are proposed to be retained as part of site intensification. The site is also proposed for residential use. Development of the site would likely result in a loss of open space.



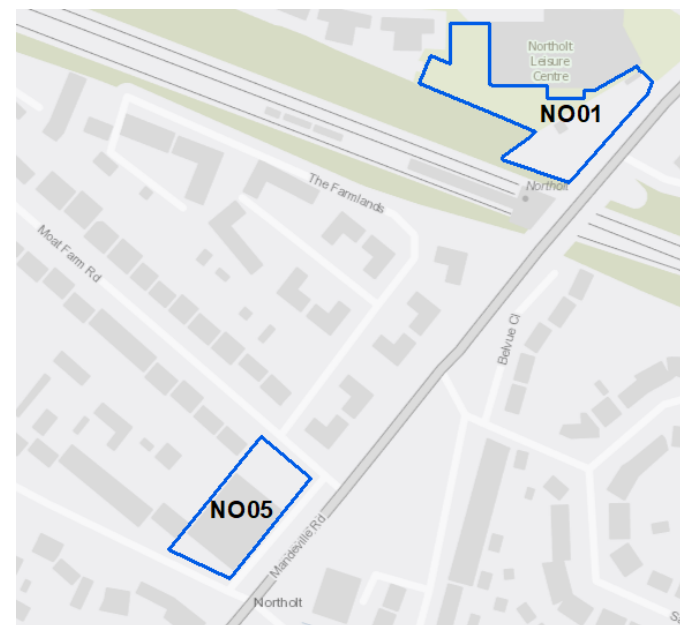
Objective	Criteria	NO03	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	-	Development of site will aim to retain educational use on 75% of site which is likely to result in some reduction in employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site currently includes a secondary school which is proposed to be retained on 75% of site
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.

Objective	Criteria	NO03	Comment
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	0	The PTAL for the site is between 2 and 3.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	+	The average road and rail noise levels of the site are less than 55db.
Resources	12	0	The site is on previously developed land.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site could result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	0	The site currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity but any loss of current features may also need to be mitigated.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	0	The site is fully located within Flood Zone 1.
	18	-	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	The site is not within an area of groundwater vulnerability.

## 5.5 Central Northolt (NO01, NO05)

These sites are located around Northolt Underground Station, NO05 a mix of town centre uses and NO01 is a mix of car parking and green space. The sites are proposed for mixed-use development to include retail and office.

The sites experience poor air quality and noise conditions which should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	NO01	NO05	Comment
Housing	1	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	+	?	Development of NO01 would result in an increase in employment capacity. Potential employment loss or gain for NO05 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	The sites are within 1km of an existing primary school.
	4	+	+	The sites are within 2km of an existing secondary school.

Objective	Criteria	NO01	NO05	Comment
Health	5	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	The sites are partially located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation.
	11	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	0	All sites are on previously developed land. NO01 is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	The sites are within 500m of heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	0	0	Both sites have limited potential for improving habitat connectivity.
	15	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	NO01 is partially located within an ecologically designated SINC in a small area along its border with the railway however the site is in poor condition and development is unlikely to impact the local network of ecologically designated sites. NO05 is not located within an ecologically designated site.
Water resources	17	-	0	NO01 contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. NO05 is fully located within Flood Zone 1.



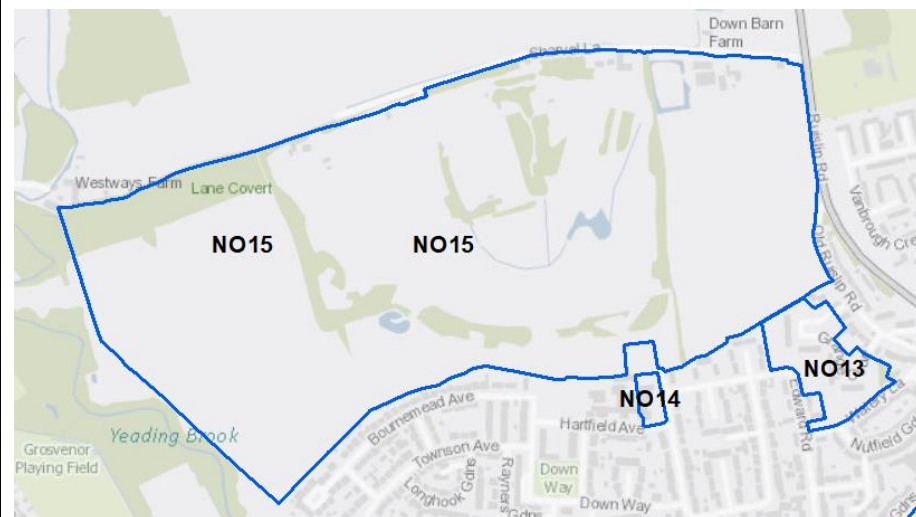
Objective	Criteria	NO01	NO05	Comment
	18	+	+	Development of NO05 and NO01 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 5.6 West London Shooting Ground (NO15)

This site comprises the West London Shooting Ground, on the edge of north-west Northolt. The site is proposed as a large scale residential development.

The site contains a Scheduled Monument (the Moated site at Down Barns Farm), which is currently on the Heritage at Risk register.

The site contains some large natural or less managed areas of higher ecological value, and forms part of a wider area of open space between Northolt, Hillingdon and Northolt Aerodrome.



Objective	Criteria	NO15	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	-	The site currently comprises leisure and limited industrial facilities which provide some employment opportunities. Development of the site would result in a net loss of employment capacity under a fully residential scheme.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.

Objective	Criteria	NO15	Comment
	6	-	Development of the sites would result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.
	7b	-	The existing specialist leisure facility would be lost through redevelopment. While there are no equivalent facilities nearby, there are other leisure facilities in the area including the West London Golf Course on the opposite (north) side of Sharvel Lane. The loss of the shooting facility is unlikely to have a significant impact on overall access to leisure facilities for the local community.
Connectivity	8	0	The PTAL for the site is between 2 and 3.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	The site contains a heritage asset, the Moated site at Down Barns Farm, a Scheduled Monument. Although the asset is at risk of negative effects from the development of the site, the asset is on the Heritage at Risk Register and development of the site also provides an opportunity to improve its condition and to enhance the setting of the asset through sensitive design. The site is within 500m of further assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	-	Development of the site could result in the loss of existing areas of moderate or high ecological value and where this occurs substantial mitigation is likely to be required.
	16	-	The site is partially located within an ecologically designated SINC and development would lead to a loss of open space within the site.
Water resources	17	-	The site is located within Flood Zone 2 or 3.

Objective	Criteria	NO15	Comment
	18	-	Development of the site would result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	The site is not within an area of groundwater vulnerability.

## 5.7 Northolt Driving Range (NO06)

This site located at the crossing of the Grand Union Canal by the A40 comprises Northolt Driving Range, with parts of the site being repurposed as sports and gym facilities and car parking. The proposed use is for an employment-led, mixed use scheme, which will include some residential uses.

Development of the site would likely result in a loss of open space. The site experiences poor air quality and noise conditions associated with the A40, and this should drive consideration of uses and potential requirements for mitigation. The site has poor public transport connectivity.



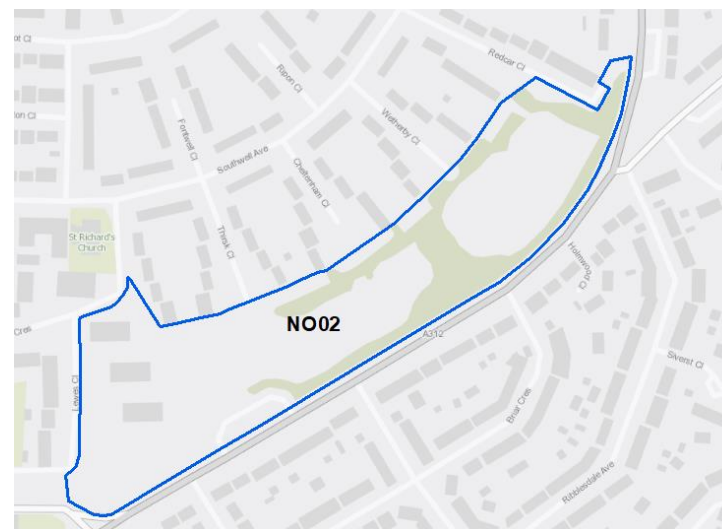
Objective	Criteria	NO06	Comment
Housing	1	+	The development of the site would result in a net increase of homes.
Economy	2	+	The development of the site would result in a net increase in employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.

Objective	Criteria	NO06	Comment
	6	-	Development of the site would result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	-	The PTAL for the site is between 0 and 1b and mitigation may be required.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	?	The site is adjacent to two conservation areas and within 500m of further heritage assets but does not currently impact the setting of these assets due the nature of the site (a golf driving range). Development of the site presents both risks and opportunities for the wider heritage setting, depending on the detailed design of the proposed developments.
Biodiversity and green infrastructure	14	-	Development of the site would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	0	The site currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	-	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	The site is not within an area of groundwater vulnerability.

## 5.8 Mandeville Parkway (NO02)

This site located near to Northolt Underground is currently a park and is proposed as residential development.

Development of the site would likely result in a loss of open space and risk of ecological impact. The site experiences poor air quality and noise conditions, and this should be considered with proposed residential uses and potential requirements for mitigation.



Objective	Criteria	NO02	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	0	Development of the site would result in no net change to employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site would result in substantial loss of existing open space. Offsetting or other measures may be necessary to address this loss.

Objective	Criteria	NO02	Comment
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	+	The PTAL for the site is between 4 and 6b.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	0	The site is on previously developed land.
Heritage and townscape	13	-	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets. Assuming that development is of appropriate massing, it is likely that potential negative effects on heritage from the development of the site could be mitigated. However, parks are often a beneficial townscape feature and loss of this space for residential development may have negative impacts.
Biodiversity and green infrastructure	14	0	Development of the site would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Mitigation may be implemented, dependent on site design and therefore may offer the potential for habitat connectivity to nearby green spaces such as Belvue Park and the Northolt and Greenford Country Park.
	15	-	Development of the site could result in the loss of existing areas of moderate or high ecological value and where this occurs substantial mitigation is likely to be required.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	-	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	The site is not within an area of groundwater vulnerability.



## 6. Perivale

### 6.1 Perivale industrial sites (PE01, PE02, PE03, PE04)

This group of Perivale sites are characterised by industrial uses and/or areas of hardstanding, and reprovision and intensification of industrial uses is proposed at PE03 and PE04 (with industrial-led intensification providing an 80% industrial and 20% residential split of proposed uses). Residential uses are proposed for the other sites.

The sites are located along either the A40 or rail corridors, and so poor air quality and noise should drive consideration of uses and potential requirements for mitigation. PE03 has poor public transport connectivity.

Development of PE04 may result in a loss of open space, and due to proximity to the River Brent the site contains areas of fluvial flood risk and mitigation would be required.



Objective	Criteria	PE01	PE02	PE03	PE04	Comment
Housing	1	+	+	+	+	The sites are not currently residential and so there would be no loss of homes. Development of all sites would result in a net increase of homes.
Economy	2	-	0	+	+	Development of PE03 and PE04 would deliver new employment capacity. Development of PE01 would result in a net decrease in capacity. Development of PE02 would not impact employment capacity.
Education and skills	3	+	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	+	The sites are within 2km of an existing secondary school
Health	5	+	+	+	+	The sites are within 1km of an existing GP surgery.

Objective	Criteria	PE01	PE02	PE03	PE04	Comment
	6	+	+	+	0	Although PE04 includes a small area of open space along the River Brent, this is not publicly accessible. There would be no loss of open space from development of the remaining sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	0	0	-	0	The PTAL for PE03 is between 0 and 1b, and mitigation may be required. The PTAL for the remaining sites is between 2 and 3.
	9	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	-	-	-	-	The sites are located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> .
	11	-	-	-	-	Average noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	0	+	+	All sites are on previously developed land. PE01, PE03 and PE04 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	0	The sites are within 500m of heritage assets, but do not currently impact the setting of these assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	+	+	+	+	The sites offer the potential for habitat connectivity through proximity to open spaces, although proximity to the A40 may limit appropriate opportunities.
	15	+	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit mostly at a small scale.
	16	0	0	0	+	PE04 is a larger site partially located within an ecologically designated SINC along its border with the river. The site is in poor condition and development offers opportunities for improving the local network of ecologically designated sites. The remaining sites are not located within ecologically designated sites.
Water resources	17	0	0	-	-	A small area of PE03 is within Flood Zone 3a (Surface Water). A larger area of PE04 is within Flood Zone 2 or 3, associated with the River Brent, and new development may require mitigation.

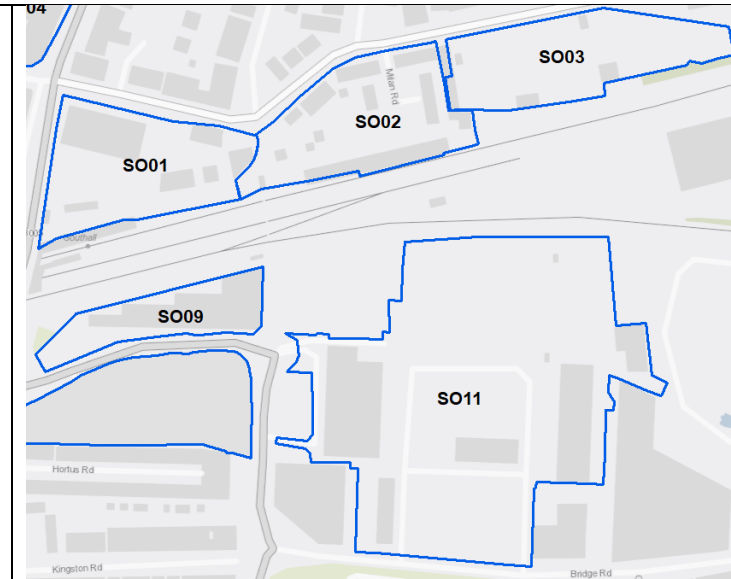
Objective	Criteria	PE01	PE02	PE03	PE04	Comment
	18	+	0	0	-	PE01 and PE04 all offer opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). However, PE04 may also result in the potential loss of open space, which could impact flood risk. Development of the remaining sites is unlikely to impact flood risk.
	19	0	0	+	+	PE01 and PE02 are within areas of medium-low groundwater vulnerability and sites PE03 and PE04 are within areas of low groundwater vulnerability.

## 7. Southall

### 7.1 Southall railside (SO01, SO02, SO03 SO09, SO11)

These sites directly adjoin the rail corridor by Southall station. The sites have a mix of current uses, predominantly industrial with some retail and community. The sites are all proposed for mixed use development, including housing, light industrial, retail and commercial, with the exception of SO03 which is proposed for a fully residential scheme.

The sites are located along either the A3005 or rail corridors, and so poor air quality and noise conditions should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	SO01	SO02	SO03	SO09	SO11	Comment
Housing	1	+	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	+	?	-	?	?	SO03 currently provides employment. Development would therefore result in a net loss of employment capacity under the proposed fully residential scheme. Development of SO01 would result in an increase in employment capacity. Potential employment loss or gain for the remaining sites would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	+	+	+	The sites are within 1km of an existing primary school.

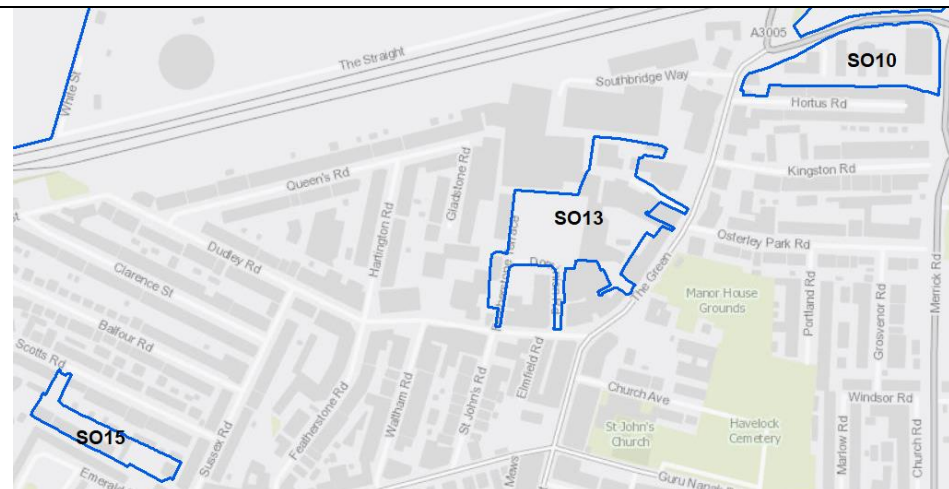
Objective	Criteria	SO01	SO02	SO03	SO09	SO11	Comment
	4	+	+	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	+	+	0	The PTAL for SO11 is between 2 and 3. The PTAL for the remaining sites is between 4 and 6b.
	9	+	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	0	0	+	SO01, SO09, SO02 and SO03 are partially located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation. SO11 is not located within an area which exceeds either of these limits.
	11	-	-	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	+	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	-	-	All sites are within 500m of heritage assets. SO09 and SO11 also contain locally listed heritage assets which would likely be lost as part of any new development. The remaining sites currently either have a slight negative impact on the wider heritage setting due to poor building condition, or do not have an impact due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	0	0	0	0	0	The sites are in a dense urban area and do not offer opportunities for habitat connectivity.
	15	+	+	+	+	0	SO11 currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity, but any loss of current features may

Objective	Criteria	SO01	SO02	SO03	SO09	SO11	Comment
							also need to be mitigated. The remaining sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	0	0	SO03 is located within an ecologically designated SINC. The site is in poor condition and development offers opportunities for improving the local network of ecologically designated sites. The remaining sites are not located within ecologically designated sites.
Water resources	17	-	0	0	-	-	SO01, SO09 and SO11 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	+	+	+	+	+	Development of all sites offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	+	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 7.2 Western Road / A3005 (SO10, SO13, SO15)

These sites are located to the southwest of Southall station, and have a mix of current uses including residential, commercial, light industrial and community. Sites SO10 and SO13 are proposed for residential uses with some additional industrial and retail uses and SO15 which is proposed for a fully residential scheme.

Some of the sites experience poor air quality (SO10, SO15) and noise conditions (SO10) which should be taken into consideration where there are proposed residential uses and the potential requirements for mitigation.



Objective	Criteria	SO10	SO13	SO15	Comment
Housing	1	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	+	?	-	SO10 currently provides limited employment associated with community uses. Development would therefore result in a net gain of employment capacity under the proposed mixed use scheme to deliver health, community and commercial/retail uses. Potential employment loss or gain for SO13 would depend on comparative employment capacity. Development of SO15 would result in a net loss of employment capacity under the proposed fully residential scheme.
Education and skills	3	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	0	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space dependent on the design of proposed developments.

Objective	Criteria	SO10	SO13	SO15	Comment
	7a	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	0	The PTAL for SO15 is between 2 and 3. The PTAL for the remaining sites is between 4 and 6b.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	+	0	SO10 and SO15 are partially located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation. SO13 is not located within an area which exceeds either of these limits.
	11	-	+	+	Average road and rail noise levels of SO10 are at or above 55db. Sensitive uses may not be suitable without mitigation. The average road and rail noise levels of SO13 and SO15 are less than 55db.
Resources	12	+	+	+	All sites are on previously developed land. All sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	-	-	0	All sites are within 500m of heritage assets. SO10 and SO13 also contain locally listed heritage assets which would likely be lost as part of any new development. SO15 does not impact the setting of heritage assets due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	0	0	0	The sites are in a dense urban area and do not offer or have very limited opportunities for habitat connectivity.
	15	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	0	0	SO10 contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	0	+	0	Development of SO13 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the remaining sites is unlikely to impact flood risk.
	19	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.



## 7.1 Warren Farm (SO19)

This site comprises a nature reserve on the site of former a sports centre and fields. A large part of the site is grassed and bounded by trees, creating an area of higher ecological value. An area of the site towards the north west has been previously built on and is currently covered with hardstanding. The site is used by walkers, and also appears to be used for some animal grazing. Proposed uses are for sports facilities and a local nature reserve.

Development of the sites would result in a loss of open space, and presents a risk of ecological impacts although the extent of any impact would depend on development design.

The site experiences poor air quality and noise conditions which should drive consideration of uses and potential requirements for mitigation.

Due to proximity to the River Brent the site contains areas of fluvial flood risk and mitigation would be required. The site is located in an area of higher groundwater vulnerability and measures to avoid or mitigate impacts may be required.



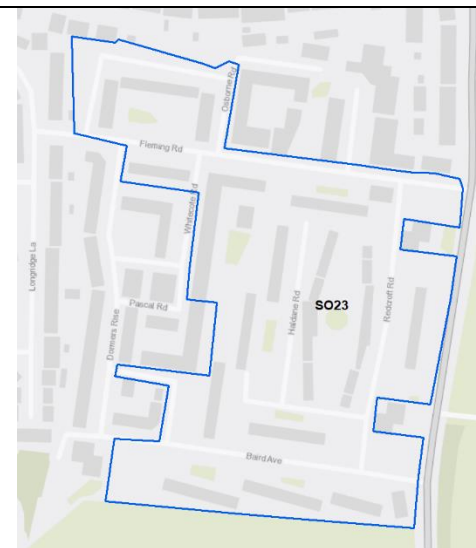
Objective	Criteria	SO19	Comment
Housing	1	0	The development of the site would not lead to a change in net homes.
Economy	2	0	The development of the site would not lead to a change in net employment.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.

Objective	Criteria	SO19	Comment
	6	-	Development of the sites would result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	-	The PTAL for the site is between 0 and 1b and mitigation may be required.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	-	Development of the site could result in the loss of existing areas of moderate or high ecological value and where this occurs substantial mitigation is likely to be required.
	16	-	The site is partially located within an ecologically designated site.
Water resources	17	-	The site contains areas within Flood Zone 2 or 3, and development would require specific mitigation to address this.
	18	-	Development of the site would result in a loss of existing open space and therefore has the potential to result in increased flood risk.
	19	-	The site is within an area of high groundwater vulnerability.

## 7.2 Golf Links Estate Plots A-J (SO23)

This site comprises parts of a housing estate in northeast Southall. The included areas of the estate are characterised by low rise blocks, interspersed with open green space. Proposed uses are for the intensification of housing provision, which may result in a decrease in the open space available within the estates.

The site experiences poor air quality and noise conditions which should drive consideration of potential requirements for mitigation of new housing and potential improvements to the existing units. The site is located in an area of higher groundwater vulnerability and measures to avoid or mitigate impacts may be required.



Objective	Criteria	SO23	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	0	The site is currently and proposed to remain residential. Therefore, development of the site would result in no net change to employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.

Objective	Criteria	SO23	Comment
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	0	The PTAL for the site is between 2 and 3.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that has very small areas recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of a conservation area but does not currently impact the setting or the assets within the conservation area due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity. The site contains small pockets of green open space for residents that may be lost due to development. However, the site has some, albeit limited potential for improving habitat connectivity due to its proximity to Brent Valley Municipal Golf Course and West Middlesex Golf Course.
	15	0	The site currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated.
	16	0	The site is not located within an ecologically designated site.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	0	Development of the site would have limited impact on reducing flood risk.
	19	-	The site is within an area of medium-high groundwater vulnerability.

### 7.3 Grand Union Canal (Main Canal) (SO16, SO17, SO18)

These sites directly adjoin the main branch of the Grand Union Canal in south Southall. The sites have a mix of residential and light industrial uses, and are all proposed for housing provision, with additional employment uses including industrial.

Development of SO17 would likely result in a loss of open space. The sites experience poor noise conditions which should drive consideration of uses and potential requirements for mitigation. SO18 has poor public transport connectivity.



Objective	Criteria	SO16	SO17	SO18	Comment
Housing	1	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	?	-	Development of SO18 would result in a decrease in employment capacity as it currently contains sales and light industry and is proposed for just residential use. Potential employment loss or gain for the remaining sites would depend on confirmation of comparative employment levels.
Education and skills	3	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	The sites are within 2km of an existing secondary school.
Health	5	+	+	+	The sites are within 1km of an existing GP surgery.

Objective	Criteria	SO16	SO17	SO18	Comment
	6	0	-	0	Development of the SO17 could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss. There would be no loss of open space from development of the SO16 or SO18. There may be opportunities to improve access to the Grand Union Canal.
	7a	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	0	0	-	The PTAL for SO18 is between 0 and 1b, and mitigation may be required. The PTAL for the remaining sites is between 2 and 3.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	+	0	+	SO17 is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation. SO18 and SO16 are not located within areas which exceed either of these limits.
	11	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	+	+	All sites are located within, partially within, or directly adjacent to conservation areas. SO18 is located close to further heritage assets including the canal lock (Grade II listed), and lock keeper's cottage (local heritage asset). All sites are within 500m of further heritage assets. The sites currently do not contribute to the wider heritage setting, particularly with reference to the canal, and sensitive development offers a chance to enhance the setting of the conservation areas and immediately adjacent assets.
Biodiversity and green infrastructure	14	+	+	+	The sites all offer the potential for improving habitat connectivity through proximity to open spaces along the canal.
	15	0	0	0	All sites currently have low overall ecological value however there are some ecological features present. Development of the sites provides limited opportunity to improve biodiversity, but any loss of current features may also need to be mitigated.
	16	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	-	0	SO16 and SO17 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. SO18 is fully located within Flood Zone 1.

Objective	Criteria	SO16	SO17	SO18	Comment
	18	+	+	+	Development of the sites offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	+	+	0	SO18 is within an area of medium-low groundwater vulnerability. The remaining sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 7.4 Central Southall (SO04, SO05, SO06, SO07)

These sites in central Southall have a mix of uses. All sites are proposed to have residential uses, community uses are also proposed for SO04, educational uses for SO05 and retail for SO06.

The sites are located in an area with many busy roads, and so poor air quality and noise should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	SO04	SO05	SO06	SO07	Comment
Housing	1	+	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	-	0	?	-	Development of SO04 would result in a net loss of employment capacity as proposed use will only retain the existing community uses alongside proposed residential. SO07 would likely see a net loss in employment with the existing car park being proposed to become residential. SO05 would potentially result in no net change to employment capacity depending on retained employment capacity at the education facility. Potential employment loss or gain for the SO06 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	+	The sites are within 2km of an existing secondary school.



Objective	Criteria	SO04	SO05	SO06	SO07	Comment
Health	5	+	+	+	+	The sites are within 1km of an existing GP surgery.
	6	0	-	0	0	SO05 includes an area of open space which would be lost. There would be no loss of open space from development of the remaining sites.
	7a	+	+	+	+	The remaining sites are within 1.5km of a health facility.
	7b	+	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	+	+	+	+	The PTAL for the sites is between 4 and 6b.
	9	+	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	0	0	0	0	The sites are partially located within areas which exceed either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	+	+	All sites are on previously developed land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	-	0	0	0	All sites are within 500m of heritage assets. SO04 also contain a locally listed heritage asset which would likely be lost as part of any new development. The remaining sites currently either have a slight negative impact on the wider heritage setting due to poor building condition, or do not have an impact due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	0	0	0	0	The sites are in a dense urban area and do not offer opportunities for habitat connectivity.
	15	+	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	0	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	0	-	0	-	SO05 and SO07 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.

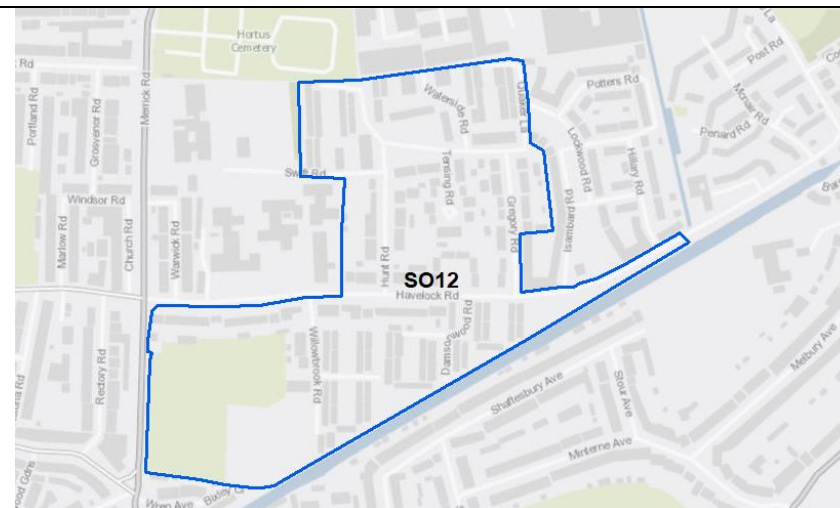
Objective	Criteria	SO04	SO05	SO06	SO07	Comment
	18	+	-	0	+	Development of SO05 could result in the loss of existing open space and therefore has the potential to result in increased flood risk. Development of the SO07 and SO04 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the remaining sites is unlikely to impact flood risk.
	19	+	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 7.5 Havelock Estate (Phases 2 - 4) (Southall – SO12)

This site comprises a housing estate directly adjacent to the Grand Union Canal in Southall. The estate is characterised by low rise blocks and terraced houses, with a small parade of retail units and interspersed with limited open green space and with a large playing field and allotments in the western part of the site.

Proposed uses are for the intensification of housing provision with some mixed uses including commercial/retail/community, which may result in a decrease in the open space available to the estate.

The site experiences poor air quality and noise conditions which should drive consideration of uses and potential requirements for mitigation.



Objective	Criteria	SO12	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	+	Development of the site would result in a net gain of employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	-	Development of the site could result in a loss of existing open space and allotments although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss.
	7a	+	The site is within 1.5km of a health facility.

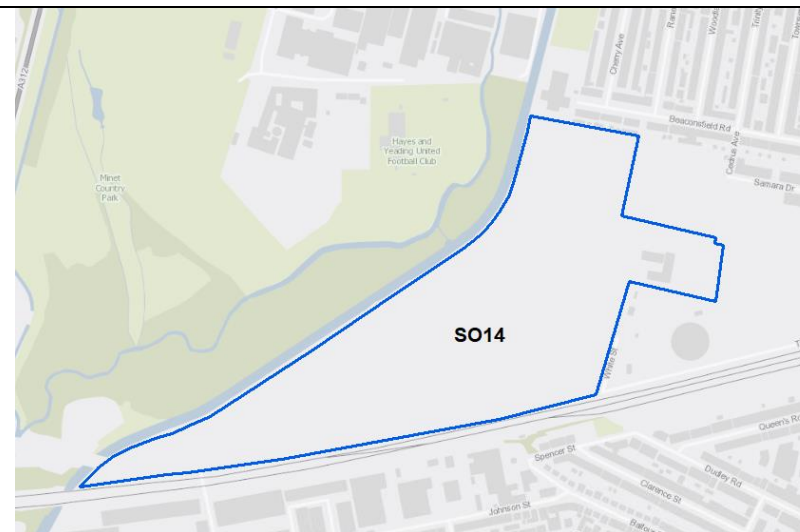
Objective	Criteria	SO12	Comment
	7b	+	The site is within 1.5km of a leisure facility.
Connectivity	8	0	The PTAL for the site is between 2 and 3.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	The site is located directly adjacent to a conservation area. The current site does not contribute to the conservation area, and sensitive development offers a chance to enhance its setting. The site is within 500m of further heritage assets but does not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	-	Development of the site would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity.
	15	0	The site currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated.
	16	0	SO12 is a large site located adjacent to an ecologically designated SINC along its border with the canal. The residential development offers limited opportunities for enhancing the local network of ecologically designated sites.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	-	Development of the site could result in the loss of existing open space and therefore has the potential to result in increased flood risk.
	19	+	Some small areas at the perimeter of the site are areas of medium-low and medium-high groundwater vulnerability. The majority of the site is not within an area of groundwater vulnerability.

## 7.6 The Green Quarter (Southall Gasworks) (SO14)

This site is currently used as a construction site and long-stay car park but was previously industrial.

Proposed uses are for a large mixed-use development with residential, employment, health and education provision.

The site experiences poor air quality and noise conditions which should be considered where there is residential development along with potential requirements for mitigation.



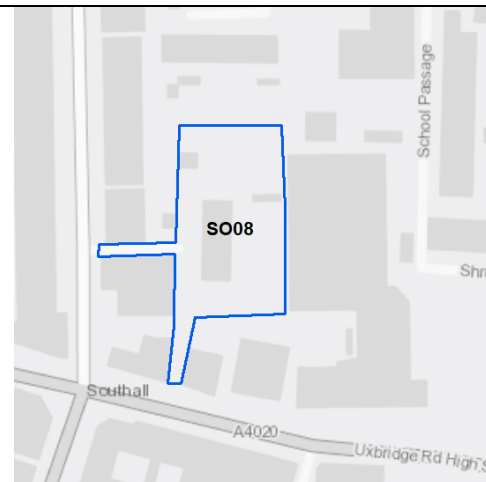
Objective	Criteria	SO14	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	+	Development of the site would deliver new employment capacity, in comparison to the construction site and car parking uses.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	0	There is currently no existing open space on-site at the moment. There may be limited opportunities to provide new open space as part of a residential mixed-use development.

Objective	Criteria	SO14	Comment
	7a	+	The site is within 1.5km of a health facility and a new facility is proposed on site.
	7b	+	The site is within 1.5km of a leisure facility and a new facility is proposed on site.
Connectivity	8	-	The PTAL for the site is between 0 and 1b.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	+	The site is located directly adjacent to a conservation area, and within 500m of other heritage assets. The area of the current site does not contribute to the setting of the conservation area or heritage assets, and sensitive development offers a chance to enhance this. .
Biodiversity and green infrastructure	14	+	Development of the site offers significant potential for improving habitat connectivity through proximity to open spaces along the Grand Union Canal and Yeading Brook, this should be considered when designing the site.
	15	+	The site currently has low or no ecological value and development provides an opportunity to improve biodiversity.
	16	+	SO14 is a large site located adjacent to an ecologically designated SINC along its border with the river. The site is in poor condition and development offers opportunities for improving the local network of ecologically designated sites.
Water resources	17	-	The site contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development.
	18	+	Development of the site offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	+	The site is not within an area of groundwater vulnerability.

## 7.7 Fairlawn Hall (SO08)

This site in central Southall provides office and educational uses, and is proposed for residential with some potential additional commercial uses.

The site experiences poor air quality and noise conditions which should drive consideration of uses and potential requirements for mitigation. Development of the site could result in a loss of open space.



Objective	Criteria	SO08	Comment
Housing	1	+	Development of the site would deliver a net increase in homes.
Economy	2	?	Potential employment loss or gain for SO08 would depend on confirmation of comparative employment capacity.
Education and skills	3	+	The site is within 1km of an existing primary school.
	4	+	The site is within 2km of an existing secondary school.
Health	5	+	The site is within 1km of an existing GP surgery.
	6	0	There is no existing open space on-site at the moment. There may be opportunities to provide new open space dependent on the design of proposed development.
	7a	+	The site is within 1.5km of a health facility.
	7b	+	The site is within 1.5km of further leisure facilities.

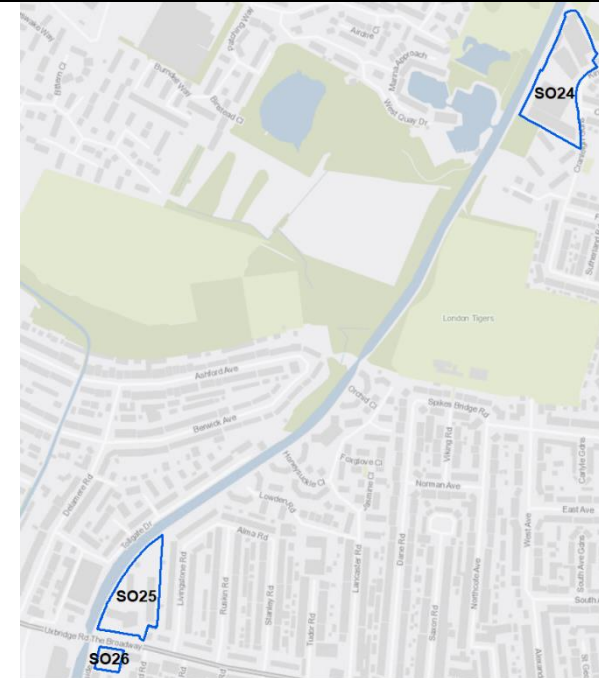
Objective	Criteria	SO08	Comment
Connectivity	8	+	The PTAL for the site is between 4 and 6b.
	9	+	The site is located within 1km of active travel routes.
Air quality and noise	10	0	The site is partially located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. Sensitive uses may not be suitable without mitigation.
	11	-	Average road and rail noise levels of the site are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	The site is located on previously developed land. The land is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	The site is within 500m of heritage assets but does not currently impact the setting of these assets due to the distance and density of the townscape between the site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	0	The site is in a dense urban area and does not offer opportunities for habitat connectivity.
	15	0	The site currently has low overall ecological value. Development of the site provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated.
	16	0	The site is not located within ecologically designated sites.
Water resources	17	0	The site is fully located within Flood Zone 1.
	18	0	Development of the site is unlikely to impact flood risk.
	19	-	The site is within an area of medium-high groundwater vulnerability.



## 7.8 Grand Union Canal (Paddington Arm) (SO24, SO25, SO26)

These sites directly adjoin the Paddington Arm branch of the Grand Union Canal in northwest Southall. SO24 is currently an industrial estate, SO25 an army barracks and SO26 contains a public house. All the sites are proposed for residential-led mixed uses.

Development of SO25 would likely result in a loss of open space. SO25 and SO26 experience poor air quality and noise conditions which should drive consideration of uses and potential requirements for mitigation. SO24 has poor public transport connectivity.



Objective	Criteria	SO24	SO25	SO26	Comment
Housing	1	+	+	+	Development of the sites would deliver a net increase in homes.
Economy	2	?	?	?	Potential employment loss or gain for all sites would depend on confirmation of comparative employment capacity.
Education and skills	3	+	+	+	The sites are within 1km of an existing primary school.
	4	+	+	+	The sites are within 2km of an existing secondary school.
wq	5	+	+	+	The sites are within 1km of an existing GP surgery.

Objective	Criteria	SO24	SO25	SO26	Comment
	6	0	-	0	Development of SO25 could result in a loss of existing open space although the extent of this loss is not known at this stage. Offsetting or other measures may be necessary to address this loss. There would be no loss of open space from development of the remaining sites. There may be opportunities to provide new open space dependent on the design of proposed developments.
	7a	+	+	+	The sites are within 1.5km of a health facility.
	7b	+	+	+	The sites are within 1.5km of a leisure facility.
Connectivity	8	-	0	0	The PTAL for SO24 is between 0 and 1b, and mitigation may be required. The PTAL for the remaining sites is between 2 and 3.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	+	0	0	SO25 and SO26 are partially located within areas which exceed either of the following limits: PM10 30µg/m <sup>3</sup> , NO <sub>2</sub> 30µg/m <sup>3</sup> . Sensitive uses may not be suitable without mitigation. SO24 is not located within an area which exceeds either of these limits.
	11	+	-	-	Average road and rail noise levels of SO25 and SO26 are at or above 55db. Sensitive uses may not be suitable without mitigation. The average road and rail noise levels of SO24 are less than 55db.
Resources	12	+	0	+	All sites are on previously developed land. All sites except SO25 are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	+	+	SO25 and SO26 are located directly adjacent to a conservation area. The current sites do not contribute to the conservation area, and sensitive development offers a chance to enhance its setting. All sites are within 500m of further heritage assets but do not currently impact the setting of these assets due to their distance and the density of the townscape between site and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the site could be mitigated.
Biodiversity and green infrastructure	14	+	-	+	Development of SO25 would result in a loss of existing open space which could impact habitat connectivity, although the extent of this loss is not known at this stage. Although mitigation may be implemented, dependent on site design there may still be a residual impact on habitat connectivity. SO24 and SO26 offer the potential for improving habitat connectivity through proximity to open spaces along the canal.
	15	+	0	+	SO25 currently has low overall ecological value however there are some ecological features present. Development of the site provides an opportunity to improve biodiversity, but any loss of current features may also need to be mitigated. The remaining sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.

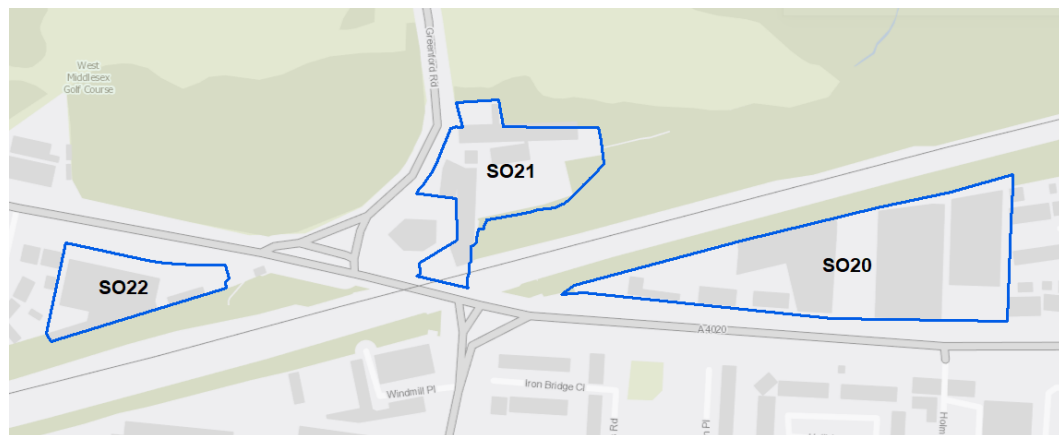
Objective	Criteria	SO24	SO25	SO26	Comment
	16	0	0	0	The sites are not located within ecologically designated sites.
Water resources	17	-	0	0	SO24 contains areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. The remaining sites are fully located within Flood Zone 1.
	18	+	+	0	Development of SO25 and SO24 offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS). Development of the remaining sites is unlikely to impact flood risk.
	19	+	+	+	The sites are either within areas of low groundwater vulnerability, or not within areas of groundwater vulnerability.

## 7.9 A4020 / A4127 junction (SO20, SO21, SO22)

These sites directly adjoin the rail corridor at the junction of the A4020 and A4127. The sites currently provide industrial and retail uses. SO20 is proposed for mixed industrial intensification, SO21 is proposed for residential, employment, community uses and open space, SO22 is proposed for a residential-led, mixed-use scheme.

The sites are located adjacent to two major roads and the rail corridor, and so poor air quality and noise conditions should drive consideration of uses and potential requirements for mitigation.

The sites are located in an area of higher groundwater vulnerability and measures to avoid or mitigate impacts may be required.



Objective	Criteria	SO20	SO21	SO22	Comment
Housing	1	0	+	+	Development of sites SO21 and SO22 would deliver a net increase in homes, there would be no change in the number of homes at SO20.
Economy	2	?	?	?	Potential employment loss or gain for the sites would depend on confirmation of comparative employment capacity.
Education and skills	3	N/A	+	+	The sites are within 1km of an existing primary school. SO20 is not proposed for residential use, therefore proximity to education facilities is less relevant.
	4	N/A	+	+	The sites are within 2km of an existing secondary school. SO20 is not proposed for residential use, therefore proximity to education facilities is less relevant.

Objective	Criteria	SO20	SO21	SO22	Comment
Health	5	N/A	+	+	Sites are within 1km of an existing GP surgery. SO20 is not proposed for residential use, therefore proximity to a GP surgery is less relevant.
	6	0	+	0	There would be no loss of open space from development of the sites. There may be opportunities to provide new open space at site SO21.
	7a	N/A	+	+	The sites are within 1.5km of a health facility. SO20 is not proposed for residential use, therefore proximity to healthcare facilities is less relevant.
	7b	N/A	+	+	The sites are within 1.5km of a leisure facility. SO20 is not proposed for residential use, therefore proximity to leisure facilities is less relevant.
Connectivity	8	0	0	+	The PTAL for SO21 and SO20 is between 2 and 3. The PTAL for the SO22 is between 4 and 6b.
	9	+	+	+	The sites are located within 1km of active travel routes.
Air quality and noise	10	-	0	0	SO20 is located within an area which exceeds either of the following limits: PM10 30µg/m³, NO₂ 30µg/m³. SO21 and SO22 are partially located within areas which exceed either of these limits. Sensitive uses may not be suitable without mitigation.
	11	-	-	-	Average road and rail noise levels of the sites are at or above 55db. Sensitive uses may not be suitable without mitigation.
Resources	12	+	+	+	The sites are on land that is recorded as contaminated, and development provides an opportunity for remediation.
Heritage and townscape	13	0	0	0	The sites are within 500m of heritage assets. All sites currently either have a slight negative impact on the wider heritage setting due to poor building condition, or do not have an impact due to their distance and the density of the townscape between sites and assets; assuming that development is of similar or appropriate massing, it is therefore likely that potential negative effects from the development of the sites could be mitigated.
Biodiversity and green infrastructure	14	+	+	+	The sites offer the potential for improving habitat connectivity through proximity to open spaces along the railway and River Brent corridors.
	15	+	+	+	The sites currently have low or no ecological value and development provides an opportunity to improve biodiversity, albeit at a small scale.
	16	+	+	+	These are large sites located adjacent to an ecologically designated site. The sites are in poor condition and development offers opportunities for improving the local network of ecologically designated sites.

Objective	Criteria	SO20	SO21	SO22	Comment
Water resources	17	-	0	-	SO22 and SO20 contain areas within Flood Zone 3a (Surface Water). It is likely that this could be mitigated as part of any new development. SO21 is fully located within Flood Zone 1.
	18	+	+	+	Development of the sites offers opportunities to reduce flood risk by removing areas of hardstanding and introducing Sustainable Drainage Systems (SuDS).
	19	-	-	-	The sites are within an area of medium-high groundwater vulnerability.

# Appendix E

## HRA

**Ealing Borough Council**

# Ealing Local Plan

Habitats Regulations Assessment Stage 1: Screening

Revision: Issue 1

27<sup>th</sup> October 2022

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 287323-10

**Ove Arup & Partners Limited**  
8 Fitzroy Street  
London  
W1T 4BJ  
United Kingdom  
[arup.com](http://arup.com)



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# Executive Summary

## 1. Introduction

### 1.1 Background

The London Borough of Ealing (LB Ealing) Council is creating a new Local Plan (LB Ealing Local Plan), which will set out a vision and framework for the future development of the area over the next 15 years. This LB Ealing Local Plan will replace the council's current suite of development plan documents, bringing together updated policies into a single plan.

The production of a Local Plan is a staged process, which includes a significant stage of evidence gathering as well as multiple rounds of community consultation to refine proposals. Ove Arup & Partners Limited ('Arup') was appointed by Ealing Council to work jointly with the Local Plan and Regeneration Team to develop a preferred spatial option for the new Local Plan.

### 1.2 Assessment Background

As part of the preparation of the Local Plan, an Integrated Impact Assessment (IIA)<sup>1</sup> has been carried out, which is a process that promotes sustainable development, health and equality through better integration of social, environmental and economic considerations into the development of the spatial options, policies and site allocations that form the Local Plan.

The IIA draws together the following Assessments and has been compiled into an IIA Scoping Report :

- Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA);
- Health Impact Assessment (HIA); and
- Equality Impact Assessment (EqIA).

As IIAs only assess ecology and biodiversity at a very high level, a Habitat Regulations Assessment (HRA) is therefore required to determine whether the updated policies of the Local Plan are likely to impact on key designated sites<sup>2</sup>, at first comprising a discrete Stage 1 Screening exercise that will indicate whether a full Stage 2 Appropriate Assessment is needed. While IIAs and HRAs are often delivered together in one report, in this case the IIA baseline has been used to help inform the HRA and the reports have been conducted separately.

Arup was therefore appointed by LB Ealing to assist in undertaking a HRA Stage 1 Screening, to form part of the evidence base for the LB Ealing Local Plan.

### 1.3 Background to HRA

This HRA Stage 1 Screening Report has drawn upon legislation from The Conservation of Habitats and Species Regulations 2017, which transpose into law in England and Wales the requirements of EC Directive 92/43/EEC on the Conservation of Habitats and Natural Fauna and Flora (the Habitats Directive). Under Article 6 of the Habitats Directive, an Assessment is required where a plan or project may give rise to significant effects upon any European Sites.

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<sup>1</sup> Arup (2022). Ealing Local Plan Integrated Impact Assessment.

<sup>2</sup> Natura 2000 network and Ramsar sites

European Sites are areas designated to conserve natural habitats and species that are rare, endangered, vulnerable or endemic within the European Community. This includes Special Areas of Conservation (SAC) and candidate SACs, designated under the Habitats Directive for their habitats and/or species of European importance, and Special Protection Areas (SPA) and candidate SPAs, classified under Directive 2009/147/EC on the Conservation of Wild Birds (the codified version of Directive 79/409/EEC as amended) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands). In addition, as a matter of Government policy, sites designated under the 1971 Ramsar Convention for their internationally important wetlands (Ramsar sites), as well as potential SACs and SPAs, are also considered.

Paragraph 3 Article 6 of the Habitats Directive states that:

*“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to Appropriate Assessment of its implications for the site in view of the site’s conservation objectives. In the light of the conclusions of the Assessment of the implications for the site and subject to paragraph 4 (see below), the competent national authority shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”*

Paragraph 4, Article 6 of the Habitats Directive states that:

*“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of social or economic nature, the Member State shall take all compensatory measures to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.”*

## **1.4 Aims and Objectives**

This document aims to provide HRA Screening (the first stage in the HRA process, see Section 3 for more details) of the policies of the LB Ealing Local Plan (see Section 2 for more details). It is necessary to assess whether the Plan, either in isolation and/or in combination with other plans or projects, would have a significant adverse effect on European Sites. In addition, the HRA is required to evaluate the Likely Significant Effects (LSE) of the LB Ealing Local Plan on European Sites within the Zone of Influence (ZoI) of the Plan and determine if there are any relevant impact pathways (between the Plan and the sites) to consider.

The specific objectives of this HRA report are to:

- Undertake Screening to identify any aspects of the LB Ealing Local Plan that would cause likely significant effects on Natura 2000 sites, otherwise known as European Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in-combination with other plans and projects.

Since the UK’s Exit from the EU, European Sites are now referred to as National Site Network (NSN) sites and will hereafter be referred to as such in this report. If Screening concludes that significant adverse effects are likely, then Appropriate Assessment (Stage 2) must be undertaken to determine whether there will be adverse effects on the integrity of a European Site(s).

## **1.5 Sections of this Report**

This report comprises the following sections:

- Section 1 – describes the background to the HRA;
- Section 2 – describes the HRA process and outlines the methodology for Stage 1 Screening;
- Section 3 - describes the LB Ealing Local Plan;
- Section 4 – identifies the NSN sites, impact types and in-combination plans and projects considered in the Assessment; and
- Section 5 – describes the results of the Screening Assessment.

## 2. The Habitats Regulations Assessment Process

### 2.1 Guidance

This HRA Screening Report has drawn upon the following guidance:

- The HRA Handbook from DTA Publications<sup>3</sup>;
- The Department for Communities and Local Government's Planning for the Protection of European Sites: Appropriate Assessment – Guidance for Regional Spatial Strategies and Local Development Documents (Consultation)<sup>4</sup>;
- Natural England's Habitats Regulations Assessment Operational Standard<sup>5</sup>; and
- The European Commission Managing Natura 2000 sites (the Provisions of Article 6 of the Habitats Directive 92/43/EEC)<sup>6</sup>.

This section outlines the stages involved in the HRA process and the specific methods that have been used in preparing this report.

### 2.2 Stages of HRA

HRA is a step-by-step process that helps to determine the likely significant effects of a plan or proposal, and (where appropriate) assess resultant adverse impacts on the integrity of a NSN site, examines alternative solutions, and provides justification for imperative reasons of overriding public interest (IROPI). The Habitat Regulations describe a four-stage process to HRA:

1. Screening: is the process which initially identifies the likely impacts upon a NSN site of a project or plan, either alone or in-combination with other projects or plans and considers whether these impacts may have a significant effect on the site's features (habitats and/or species). It is important to note that the burden of evidence is to show, on the basis of objective information, that there will be no significant effect; if the effect may be significant, or is not known, that would trigger the need for an Appropriate Assessment. There is European Court of Justice (ECJ) case law to the effect that unless the likelihood of a significant effect can be ruled out on the basis of objective information, and adopting the precautionary principle, then an Appropriate Assessment must be undertaken.
2. Appropriate Assessment: is the detailed consideration of the impact upon the integrity of the NSN site of the project or plan, either alone or in combination with other projects or plans, with respect to the site's conservation objectives and its structure and function. This is to determine whether or not there will be adverse effects on the integrity of the site. This stage also includes the inclusion of mitigation measures to avoid or reduce any possible impacts. This is the final stage reached within this report.
3. Assessment of alternative solutions is the process which examines alternative ways of achieving the objectives of the project or plan that would avoid adverse impacts on the integrity of the NSN site, should avoidance or mitigation measures be unable to cancel out adverse effects.
4. Assessment where no alternative solutions exist and where adverse impacts remain is made with regard to whether or not the development is necessary for imperative reasons of overriding public interest (IROPI).

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<sup>3</sup> Tyldesley & Chapman (2013) The Habitats Regulations Assessment Handbook. DTA Publications. As updated.

<sup>4</sup> Department for Communities and Local Government (2006) Planning for the Protection of European Sites: Appropriate Assessment – Guidance for Regional Spatial Strategies and Local Development Documents.

<sup>5</sup> Natural England (2017) Habitats Regulations Assessment Operational Standard.

<sup>6</sup> European Commission (2018) Managing Natura 2000 Sites. The Provisions of Article 6 of the Habitats Directive 92/43/EEC.

If this is the case, this stage also involves identification of compensatory measures needed to protect and maintain the overall coherence of the NSN site network.

## 2.3 Approach to Screening

This Screening Report takes into account the requirements of the Habitats Regulations and relevant guidance as well as the recent European Court of Justice ruling in the case of *People Over Wind and Sweetman v Coillte Teoranta*<sup>7</sup>.

The following stages have been completed:

- Identification of all NSN sites potentially affected (including those outside of the LB Ealing Local Plan area for which impact pathways have been identified);
- A review of each site, including the features for which the site is designated, the Conservation Objectives, and an understanding of the current conservation status and the vulnerability of the individual features to threats;
- A review of the policies which have the potential to affect the NSN sites, and whether the sites are vulnerable to these effects (this has included a categorisation of the potential effects of the policy, in line with guidance from Natural England); and
- A consideration of impacts in combination with other plans or projects.

The HRA Screening shall include all NSN sites that meet any of the following Screening criteria:

- Is within 2km of an NSN site or functionally linked land<sup>8</sup>;
- Is within 30km of a SACs, where bats are noted as one of the qualifying features;
- Crosses or lies adjacent to, upstream of, or downstream of, a watercourse which is designated in part or wholly as a NSN site;
- Has a potential hydrological or hydrogeological linkage to a NSN site containing a groundwater dependent terrestrial ecosystem (GWDTE) which triggers the Assessment of NSN sites; and
- Has an affected road network (ARN) which triggers the criteria for the Assessment of NSN sites.

## 2.4 Definition of Likely Significant Effects

A critical part of the HRA Screening process is determining whether the proposals are likely to have a significant effect on NSN sites and, therefore, if they will require an Appropriate Assessment. Judgements regarding significance should be made in relation to the qualifying features for which the site is of European importance, and also its conservation objectives. A useful definition of an effect is provided in The Chartered Institute of Ecology and Environment Management's (CIEEM) guidance for Ecological Impact Assessment<sup>9</sup>, which can be drawn upon in this case:

- *“Effect - Outcome to an ecological feature from an impact. For example, the effects on a dormouse population from loss of a hedgerow”.*

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<sup>7</sup> <http://curia.europa.eu/juris/document/document.jsf?docid=200970&doclang=EN>

<sup>8</sup> Effect pathways on qualifying features that are mobile species can extend to land occupied outside of the designated site boundary this is defined as functionally linked land

<sup>9</sup> CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.

## 2.5 Consideration of In-combination Effects

It is necessary for this HRA to consider in-combination effects with other plans and projects that could act in-combination with the LB Ealing Local Plan to result in any likely significant effects on the NSN sites identified.

It should be noted that in-combination effects only require consideration where the plan or project being assessed has an impact, whether significant or not. A conclusion of no effects negates the possibility of in-combination effects.

## 2.6 Evidence Gathering

### 2.6.1 NSN Sites

All NSN sites within the zone of influence of the LB Ealing Local Plan (in terms of possible significant effects through a known impact pathway) are included within this Screening Report. An online desk study was undertaken to obtain information on NSN sites with reference to the following sources:

- Natura 2000 Standard Data Forms and Ramsar Information Sheets were obtained from the Joint Nature Conservation Committee (JNCC) website;
- Citations, conservation objectives for NSN sites and condition Assessments for component SSSIs (Sites of Special Scientific Interest) were sourced from Natural England's website; and
- Natural England's SSSI Impact Risk Zones (IRZs) were reviewed via Defra's online Magic maps application.

### 2.6.2 In-combination Plans and Projects

In addition to considering the effects of policies on an individual basis, a review of the likely cumulative impacts on all policies in-combination, and in combination with the New London Plan (adopted March 2021), has been undertaken.

## 2.7 Assessment of Effects in Relation to Conservation Objectives

The assessment of effects on NSN sites in relation to their conservation objectives has taken into account the following factors:

- The implications for each qualifying feature of the NSN sites affected;
- The conservation status of the qualifying features of the sites;
- Implications for the site condition of SSSI units of SPAs; and
- Threats, degradations or disturbance of the qualifying features.

## 2.8 Integrity Test

The report considers whether the LB Ealing Local Plan has an adverse effect on the integrity of NSN sites, to inform the 'integrity test'. Integrity is described as:

*"The site's coherence, ecological structure and function across its whole area that enables it to sustain the habitat, complex of habitats and/or the levels of populations of species for which it was classified"*<sup>30</sup>.

Integrity also relates to a site's resilience and ability to evolve in ways that are favourable to conservation.

## **2.9 Use of Professional Judgement**

Professional judgement has been used in the interpretation of results in relation to assessment of effects, the significance of effects and consequences for the conservation objectives of NSN sites. A precautionary Assessment has been applied in line with current guidance, whereby an effect is deemed significant if the effect cannot be ruled out on the basis of objective information.

## **2.10 Consultation**

The IIA Scoping Report was published in January 2022 and was subsequently consulted upon in accordance with the requirements of Regulation 12 (5) of the SEA Regulations and was issued to statutory consultation bodies (such as Natural England, Historic England and the Environment Agency) and was also publicly available for comment on the Ealing Council website.

Comments on the Scoping Report were reviewed and have been taken into account as the IIA process has continued. A summary of the consultation responses received and an outline of how these have been addressed is set out in Appendix A of the IIA. Natural England did not make any comments on the IIA Scoping Report.

## **2.11 Assumptions and Limitations**

As full modelling assessments for traffic data and air quality have not been carried out at this stage, no verification of predicted indicative pollutant concentrations has been undertaken. This level of assessment is appropriate to the stage of the LB Ealing Local Plan.



## 3. The Ealing Local Plan

### 3.1 The Preferred Spatial Option

The preferred spatial option builds upon the wider London Plan Spatial Framework and is underpinned by the following key development principles:

- Delivering growth along transport corridors;
- Focussing on neighbourhood centres; and
- Promoting sustainable connectivity.

### 3.2 Strategic Policies

The vision and objectives set out in Sections 3.9 to 3.21 of the LB Ealing Local Plan. The Strategic Policies implement this vision. The policies are set out under a number of headings as follows:

- Policy SP.1: A Vision for Ealing;
- Policy SP.2: Tackling the *Climate Crisis*;
- Policy SP.2: Fighting *inequality*; and
- Policy SP.3: Creating *good jobs and growth*.

For the purpose of this HRA Screening Report, these strategic policies will not be assessed, as the details of these policies are translated into the Town Policies (Section 3.3) and Development Management Policies (Section 3.4), which will be assessed.

### 3.3 Town Policies

The following Town Policies have been adopted into the LB Ealing Local Plan. These policies are described in detail within the LB Ealing Local Plan, which should be read in conjunction with this HRA Screening Report.

#### 3.3.1 Acton Town Policies

Policy A.1: Acton Spatial Strategy

Policy A.2: Acton Town Centre

Policy A.3: South Acton

Policy A.4: Acton Main Line Station and environs

Policy A.5: East Acton neighbourhood centre

Policy A.6: North Acton

#### 3.3.2 Ealing Town Policies

Policy E.1: Ealing Spatial Strategy

Policy E.2: Ealing Metropolitan Town Centre

Policy E.3: Northern Ealing

Policy E.4: Southern Ealing and Ealing Common

### **3.3.3 Greenford Town Policies**

Policy G.1: Greenford Spatial Strategy

Policy G.2: Greenford Town Centre

Policy G.3: Westway Cross Neighbourhood Centre

Policy G.4: Sudbury Hill Neighbourhood Centre

Policy G.5: Greenford Station Local Centre

### **3.3.4 Hanwell Town Policies**

Policy H.1: Hanwell Spatial Strategy

Policy H.2: Hanwell Town Centre

### **3.3.5 Northolt Town Policies**

Policy N.1: Northolt Spatial Strategy

Policy N.2: Northolt Neighbourhood Town Centre

Policy N.3: White Hart Neighbourhood Centre

### **3.3.6 Perivale Town Policies**

Policy P.1: Perivale Spatial Strategy

Policy P.2: Bilton Road Neighbourhood Centre

Policy P.3: Medway Parade Local Centre

Policy P.4: Perivale Station Local Centre

### **3.3.7 Southall Town Policies**

Policy S.1: Southall Spatial Strategy

Policy S.2: Southall Town Centre

Policy S.3: King Street Neighbourhood Centre

Policy S.4: West Southall

Policy S.5: East Southall

## **3.4 Development Management Policies**

The Development Management Policies outlined in Table 1 have been prepared in the context of national planning policy and guidance. They have also had regard to key government strategies and documents in defining the important issues and approaches to be taken in the LB Ealing Local Plan. These policies are described in detail within the LB Ealing Local Plan, which should be read in conjunction with this HRA Screening Report.

**Table 1 Development Management Policies and their descriptions.**

<b>DM Policy</b>	<b>Description</b>
Policy CO: Carbon Offsetting	Ealing's local energy policy will focus upon the contribution necessary from new development in order to make the borough net carbon neutral by 2030. In particular this will include a local implementation of appropriate BREEAM or Passivhaus standards for residential and commercial development, and guidance as to how these should be implemented in mixed developments which will make up a larger percentage of development in the future. The policy will also outline appropriate arrangements for carbon offsetting where this is necessary, and plans and initiatives for retrofitting the existing housing stock, including measures that go beyond planning.
Policy D9: Tall Buildings	Tall buildings above the thresholds identified for each area within LB Ealing should be located upon allocated development sites defined in the development plan. Tall buildings on designated industrial sites will be subject to agreed masterplans and based upon local impacts and sensitivity.
Policy DAA: Design and Amenity	<p>New development must take responsibility for mitigating any adverse effects upon its neighbours and surroundings. This mitigation process should follow a sequential approach of first avoiding impacts through design, and then mitigating any remaining adverse impacts..</p> <p>In particular, development should ensure::</p> <ol style="list-style-type: none"> <li>protection of sensitive uses within or outside the development;</li> <li>high quality design;</li> <li>good levels of daylight and sunlight;</li> <li>good levels of privacy; and</li> <li>positive visual impact.</li> </ol>
Policy E3: Affordable Workspace	<p>Affordable workspace in Ealing will be provided on the basis of a levy on development of 10% of gross floor area in mixed use schemes, and 5% of net floorspace in Office and Industrial schemes. Where that levy would result in affordable provision of at least 1000sqm of mixed-use space, 2000sqm of office space, or 3000sqm of industrial space, then provision should be onsite. Where the total space provided by development is less than these thresholds then provision should be by means of offsite contributions.</p> <p>Where affordable workspace is to be provided onsite then development should be supported by a business plan that demonstrates the viability and suitability of the space for its intended occupants, the optimisation of the site for this use and of the development overall, and appropriate management of the space for the duration of its use as affordable space.</p> <p>Affordable workspace will be provided at 80% discount for a period of 15 years. Where an offsite contribution is calculated it should be on the basis of the level of provision (5% or 10% of total development size) multiplied by the value of an 80% reduction in rent for 15 years.</p>
Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function	<p>To deliver and maintain a sufficient supply of land for industry, logistics and economic services over the plan period::</p> <ol style="list-style-type: none"> <li>Industrial intensification and reuse will be the primary consideration on industrial land and on the site of any existing employment use in Ealing. There is no identified capacity for release of industrial space in Ealing over the life of the plan.</li> <li>Industrial sites will be managed according to the following hierarchy of designations: <ol style="list-style-type: none"> <li>SIL – will accommodate only conforming uses;</li> <li>LSIS – receives the same protection as SIL, but may be acceptable for mixed intensification subject to an agreed masterplan; and</li> <li>Non-designated sites – will follow a sequential approach to test reprovision of pure industrial uses, then a mix of uses from most industrial provision to least, before any release is permitted.</li> </ol> </li> <li>Where industrial sites can accommodate mixed development including housing the affordable housing capacity of the site will be calculated based on its constrained value, i.e. based upon a scheme that first offers the maximum practicable industrial provision.</li> </ol>
Policy E6: Locally Significant Industrial Sites (LSIS)	<p>Management of LSIS in Ealing will be based on the following principles:</p> <ol style="list-style-type: none"> <li>Industrial needs remain the primary consideration on designated LSIS within Ealing and individual applications on these sites will continue to be determined according to the same principles as SIL.</li> <li>Mixed-intensification may be suitable on LSIS in cases where a masterplan is agreed with Ealing according to the following principles: <ol style="list-style-type: none"> <li>It extends to the full boundary of the LSIS;</li> <li>It meets objectively assessed industrial needs; and</li> <li>It achieves a high quality of built environment and delivers any necessary supporting infrastructure.</li> </ol> </li> </ol>
Policy ENA: Enabling Development (ENA)	<p>Enabling development must be:</p> <ol style="list-style-type: none"> <li>Demonstrably led by the objectives of the designation in question; and</li> <li>Proportionate to the costs of the objective that is enabled.</li> </ol> <p>Meeting housing or any other development target is not in itself enabling development.</p>
Policy FLP: Funding the Local Plan	<p>The Council will:</p> <ol style="list-style-type: none"> <li>Follow the approach set out in the London Plan (2021) in respect of negotiations on planning obligations to reflect strategic and local priorities for the provision of infrastructure.</li> </ol>

DM Policy	Description
	<ul style="list-style-type: none"> <li>b) Establish Local priorities with reference to the Council's Infrastructure Delivery Plan and associated schedule which identifies and promotes improvements in physical, social, and green infrastructure.</li> <li>c) Create a clear framework for future negotiations on planning obligations, including developer contributions that will include a new Community Infrastructure Levy (CIL) for Ealing LPA. More detail will be provided in a separate Supplementary Planning Document on Planning Obligations and Legal Agreements.</li> </ul>
Policy G4: Open Space	<p>Development proposals on green and open space should:</p> <ul style="list-style-type: none"> <li>a) Be led by the purposes of nature conservation and recreation. The size of development within green and open spaces and its impact upon visual openness must be kept at a minimum.</li> <li>b) Preserve and enhance the visual openness of green and open spaces particularly with regard to views to, from, within, and across these areas.</li> </ul>
Policy G5: Urban Greening	LB Ealing will follow best practice in setting a borough-specific Urban Greening Factor according to local needs. The standard will address small sites and minor developments, as well as the major developments outlined in the London Plan. Ealing's approach will also address commercial, and mixed development in more detail, particularly the case of mixed industrial-residential intensification.
Policy H16: Large Scale Purpose Built Shared Living	Development of large-scale shared living will only be permitted within Ealing Metropolitan Town Centre.
Policy HOU: Affordable Housing	<p>Affordable housing contributions must address identified needs in Ealing in order to constitute appropriate provision. In particular affordable housing provision will be based upon:</p> <ul style="list-style-type: none"> <li>a) A strategic target of 50% as set out by the London Plan;</li> <li>b) A split of 70% affordable rent to 30% intermediate provision; and</li> <li>c) An appropriate mix of tenures and unit sizes.</li> </ul> <p>Development that adversely effects affordable housing provision, tenure, or mix will be refused.</p> <p>The Fast Track route in Ealing will only apply to provision of 40% affordable housing or above and will depend upon meeting Ealing's preferred housing mix and tenure. Provision should be made on site and units secured in perpetuity for affordable use will normally be preferred. Qualification for the Fast Track route will depend upon meeting Ealing's preferred housing mix and tenure</p>
Policy SSC: Small Sites Contribution	<p>Ealing will seek affordable housing contributions from all housing development. On small sites this will be as follows:</p> <ul style="list-style-type: none"> <li>a) On sites of 5 – 9 dwellings a financial contribution equivalent to 20% affordable provision; and</li> <li>b) On sites of 1 – 4 dwellings a financial contribution equivalent to 10% affordable provision. Subject to viability testing of the plan to assess its impact on overall housing delivery Ealing will seek affordable housing contributions from all housing development. In the case of small sites this will be based upon offsite provision and subject to individual viability testing.</li> </ul> <p>Ealing's affordable housing needs considerably exceed the London Plan strategic target of 50% and it is therefore appropriate for small sites also to contribute to affordable provision.</p>
Policy TCS: Town Centres	Changes in national policy, particularly the introduction of Class E and related permitted development rights have created a fundamentally different climate for the management of town centres. Similarly exceptional economic circumstances resulting from Brexit and Covid have made difficult conventional forecasts of office and retail needs. Ealing is currently developing evidence that examines the effects of these complex changes and makes recommendations to address their impact on town centres. The plan will apply a proactive approach to the management of town centres that is designed to preserve and enhance their commercial, social, and cultural functions within the overall framework of 20-minute neighbourhoods.

## 4. Identification of NSN Sites

### 4.1 NSN Sites

As part of this HRA, information has been gathered to establish:

1. NSN sites within and outside the LB Ealing Local Plan area potentially affected;
2. NSN site characteristics and conservation objectives; and
3. Other relevant plans or projects.

Based on the information gathered, there are no NSN sites within the LB Ealing Local Plan boundary; therefore no direct land-take from any NSN is predicted as a result of Local Plan implementation. However, NSN sites outside of the Local Plan boundary (i.e. NSN sites outside of LB Ealing) may be affected by activities undertaken within the LB Ealing Local Plan area if they are connected via an impact pathway. Examples of potential impact pathways are river catchments and weather systems, which can transport pollutants downstream and downwind, respectively, carrying particulates across vast distances beyond borough-scale boundaries.

**Table 2 NSN sites that could be affected by the LB Ealing Local Plan.**

Name of Site	Status	Distance from LB Ealing Local Plan Boundary
Mole Gap to Reigate Escarpment	SAC	24.5km south
Richmond Park	SAC	4.2km south
South West London Waterbodies	SPA and Ramsar	7.5km south-west
Wimbledon Common	SAC	5.9km south-east

While none of these sites lie within LB Ealing, there is potential for impact pathways to exist between LB Ealing, Richmond Park SAC, Wimbledon Common SAC, South West London Waterbodies SPA and Ramsar, and Mole Gap to Reigate Escarpment SAC. Further information on all the sites included in this HRA Screening is given in the following sections below. Baseline information on the sites was derived from Joint Nature Conservation Committee<sup>10</sup> and Natural England<sup>11</sup> websites.

#### 4.1.1 Mole Gap to Reigate Escarpment SAC

##### Site Description

Mole Gap to Reigate Escarpment SAC covers an area of 887.68 ha and lies approximately 24.5km to the south of LB Ealing.

##### Baseline Conditions

This SAC comprises a network of habitats including broadleaved woodland, which dominates, and dry grassland interspersed with patches of heathland and scrub. Maquis and garrigue scrubland that developed from the progressive destruction and exploitation of former broadleaf woodland is also present.

This SAC supports Bechstein's bat *Myotis bechsteinii*, a species closely associated with mature, broadleaved woodland and has often been noted as using old woodpecker holes and rot cavities as roosting sites. Most populations appear to be small and vulnerable to damaging influences such as the loss of hibernation sites.

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<sup>10</sup> Joint Nature Conservation Committee. UK Protected Sites. Available to view at <http://jncc.defra.gov.uk/default.aspx?page=4>

<sup>11</sup> Natural England. Conservation Objectives for European Sites. Available to view at <http://publications.naturalengland.org.uk/category/6490068894089216>

Small numbers of Bechstein's bat have been regularly recorded at Mole Gap to Reigate Escarpment SAC over an extended period, most notably utilising underground caverns in the chalk as hibernation sites.

The site is designated under Article 17 of the Directive (92/43/EEC) as it hosts the following qualifying species listed in Annex IV:

- Bechstein's bat *Myotis bechsteinii*.

### Scope Site In or Out

The M25 motorway lies to the north of the Mole Gap to Reigate Escarpment SAC and is likely to be a major barrier between the SAC and LB Ealing for Bechstein's bat. This is because Bechstein's bats fly slowly, generally within and close to vegetation, and typically at low levels (often <2m) above the ground. Traffic noise coupled with lighting from both vehicles and road lights are likely to form a significant barrier to flight at those levels, deterring bats from attempting to commute across the eight-lane motorway. Air turbulence over the carriageway caused by high-speed traffic, which may be too strong for effective flight movement of any bats that do attempt to cross the road, is a further potential barrier to this movement. Finally, this species is a short-distance flier and typically commutes just 1.5km to favoured foraging grounds<sup>12</sup>. Due to the large size of this SAC, it is therefore likely that Bechstein's bats will forage within the SAC alone, hence it is unlikely that any bats from the SAC would reach the LB Ealing.

As the risk of the LB Ealing Local Plan impacting the site's qualifying features is negligible, this SAC is therefore not considered further in this report.

### 4.1.2 Richmond Park SAC

#### Site Description

Richmond Park SAC (comprising also Richmond Park SSSI) covers an area of 846.27ha and lies approximately 4.2km to the south of LB Ealing.

This SAC has been managed as a royal deer park since the seventeenth century, producing a range of habitats of value to wildlife. In particular, Richmond Park is of importance for its diverse deadwood beetle fauna associated with the ancient trees found throughout the parkland. Many of these beetles are indicative of ancient woodland areas where there has been a long continuous presence of over-mature timber. The site is at the heart of the south London centre of distribution for stag beetle *Lucanus cervus*.

The site is designated under Article 4.4 of the Habitats Directive (92/43/EEC) as it hosts the following qualifying species listed in Annex II:

- Stag beetle *Lucanus cervus*.

#### Baseline Conditions

The stag beetle requires decaying wood to complete its lifecycle. Its eggs are laid underground in the soil next to logs or the stumps of dead trees (typically apple *Malus spp.*, beech *Fagus spp.*, elm *Ulmus spp.*, lime *Tilia spp.* and oak *Quercus spp.*). The beetle larva will spend up to seven years in the wood, slowly growing in size. Timber is also utilised, especially sunken fence posts. Richmond Park SAC has a large number of ancient trees with decaying timber. It is at the heart of the south London centre of distribution for stag beetle, and more generally is a site of national importance for the conservation of the fauna of invertebrates associated with the decaying timber of ancient trees.

### Scope Site In or Out

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<sup>12</sup> Bat Conservation Trust, Bug Life and Plant Life. Back from the Brink: The Bechstein's Bat. Available to view at <https://naturebftb.co.uk/wp-content/uploads/2022/01/Bechsteins-bat-species-account.pdf>

Due to its close proximity to the LB Ealing Local Plan area and potential impact pathways (primarily related to air quality), the potential risk of the Local Plan impacting the site's qualifying features is sufficient to require this SAC to be considered further in this report.

#### 4.1.3 South West London Waterbodies SPA and Ramsar

##### Site Description

The South West London Waterbodies SPA and Ramsar covers an area of 828.14ha and lies approximately 7.5km to the south-west of LB Ealing.

This SPA and Ramsar comprise a series of embanked water supply reservoirs and former gravel pits that support a range of man-made and semi-natural open-water habitats.

The site is designated under Article 4.1 of the Wild Birds Directive as it hosts the following qualifying species listed in Annex I:

- Gadwall *Anas strepera* (non-breeding); and
- Northern shoveler *Anas clypeata* (non-breeding).

The SPA boundary is coincident with Kempton Park Reservoirs SSSI, Knight & Bessborough Reservoirs SSSI, Thorpe Park No. 1 Gravel Pit SSSI, Wraysbury No. 1 Gravel Pit SSSI, Wraysbury Reservoir SSSI, and includes parts of Staines Moor SSSI and Wraysbury & Hythe End Gravel Pits SSSI.

##### Baseline Conditions

When classified in September 2000, the SPA supported 710 individual gadwalls which represents 2.4% of the North-west European population. Gadwall are now distributed widely across the UK, using both inland and coastal wetlands. Gadwall favour shallow water bodies which are naturally nutrient-rich with low levels of human disturbance, and tend to utilise lakes with an 'open' landscape character i.e. low levels of dense fringing vegetation of scrub or reed-beds. The gadwall feeds primarily on aquatic vegetation and may also eat invertebrates. They frequently feed on aquatic and semi-aquatic plants brought to the surface by other duck species. Water quality and chemistry are therefore important aspects in habitat suitability as factors such as high levels of turbidity or siltation may render sites or parts of sites unsuitable if macrophyte beds are affected. The different types of water body provide a range of habitat features which are of value for gadwall at different times.

When classified, the SPA supported 853 individual shovelers, which represented 2.1% of the NW and central European population. Like gadwall, shoveler favour similar types of inland waterbodies such as lakes and reservoirs with extensive shallows including beds of silt and submerged macrophytes. Like gadwall they favour waterbodies with shallow margins/areas and where at least parts have an open, tree-less landscape character. They typically feed in areas with beds of macrophytes at shallow depth as these areas are often particularly rich in invertebrate food. A larger proportion of their diet is made up by invertebrates and so is higher in calorific value than the predominantly plant food taken by Gadwall. Plant matter may also make a very minor part of shoveler diet.

##### Scope Site In or Out

Due to its close proximity to the LB Ealing Local Plan area and potential impact pathways (primarily related to air quality and water use), the potential risk of the Local Plan impacting the site's qualifying features is sufficient enough to require this SPA and Ramsar to be considered further in this report.



#### 4.1.4 Wimbledon Common SAC

##### Site Description

Wimbledon Common SAC covers an area of 348.31ha and lies approximately 6km to the south-east of LB Ealing.

This SAC supports an extensive area of open, wet heath on acidic soil and also contains a variety of other acidic heath and grassland communities. The high plateau in the east and north of the site has a capping of glacial gravels overlying Claygate Beds and London Clay, which are exposed on the western slope of the Common. The acidic soils and poor drainage give rise to a mosaic of wet heath and unimproved acidic grassland. Seminal natural broadleaved woodland covers the deeper, clay soils of the western slope.

A significant cover of heather *Calluna vulgaris* distinguishes areas of dry and wet heath. The wet heath supports typical species such as the heath rush *Juncus squarrosus*. The brown sedge *Carex disticha* is present, as is mat-grass *Nardus stricta* on drier parts. Localised areas of dry heath support bell heather *Erica cinerea* and dwarf gorse *Ulex minor*.

The semi-natural woods of the clay soils comprise a dense canopy of maturing pedunculate oak *Quercus robur* and silver birch *Betula pendula*, with beech *Fagus sylvatica*, hornbeam *Carpinus betulus* and aspen *Populus tremula* in parts. Holly *Ilex aquifolium* is the dominant understorey species. Hazel *Corylus avellana* and alder buckthorn *Frangula alnus*, also occur. Where sufficient light penetrates there is a herb layer of bracken *Pteridium aquilinum* and bramble *Rubus fruticosus* agg.

Wimbledon Common has a large number of old trees and much fallen decaying timber. The site supports a number of other scarce invertebrate species associated with decaying timber, including the stag beetle.

The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following qualifying habitats listed in Annex I:

- European dry heaths; and
- Northern Atlantic wet heaths with *Erica tetralix* (Wet heathland with cross-leaved heath).

Additionally, the site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following qualifying species listed in Annex II:

- Stag beetle *Lucanus cervus*.

Wimbledon Common SAC is situated within 1km of Richmond Park SAC, which is also classified as an SAC for stag beetle.

##### Baseline Conditions

This SAC includes examples of dry heath vegetation typical of the south-east of England. It is mostly present as part of a habitat mosaic which includes acid grassland, gorse scrub, bracken, birch woodland and transitions to wet or 'humid' heath. The dry heath vegetation is characterised by patches of heather *Calluna vulgaris*, with occasional dwarf gorse *Ulex minor* and common gorse *U. europaeus*. Where soils are free-draining there are transitions to dry acid grassland where wavy hair-grass *Deschampsia flexuosa*, sheep's fescue *Festuca ovina* and sheep's sorrel *Rumex acetosella* are common associates of heather. Where soils are less free-draining, tormentil *Potentilla erecta*, purple moor-grass *Molinia caerulea* and heath rush *Juncus squarrosus* are typically frequent.

Wet heath usually occurs on acidic, nutrient-poor substrates, such as shallow peats or sandy soils with impeded drainage. This SAC supports small but important areas of 'humid' heath as part of a complex mosaic of habitats. This type of heath vegetation is a very rare feature in the London area. The humid heath vegetation is characterised by varying amounts of heather, cross-leaved heath *Erica tetralix*, purple moor-grass and dwarf



gorse, with locally uncommon plants including creeping willow *Salix repens*, heath grass *Danthonia decumbens* and mat grass *Nardus stricta*.

### Scope Site In or Out

Due to its close proximity to the LB Ealing Local Plan area and potential impact pathways (primarily related to air quality), the potential risk of the Local Plan impacting the site's qualifying features is sufficient enough to require this SAC to be considered further in this report.

## 4.2 Non-NSN Sites

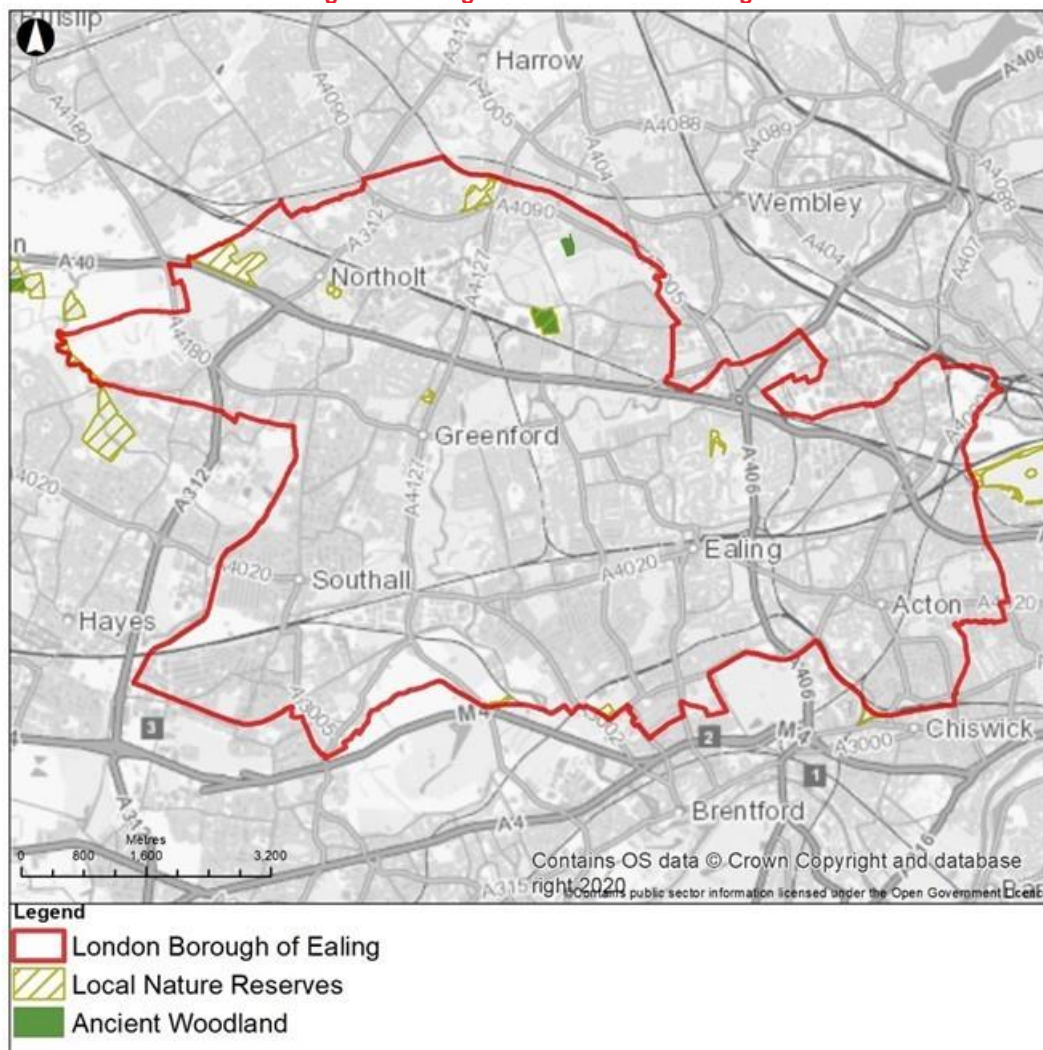
Within LB Ealing, there are nine Local Nature Reserves (LNR) and a further three within 1km (Figure 1). There are also three areas of ancient woodland within 1km as well as sporadic areas of deciduous and broadleaved woodland, grasslands and several parks / gardens, most notably Osterley Park in the south of the borough.

Sites of Importance to Nature Conservation (SINCs) are designated by local authorities as areas of local importance to wildlife and biodiversity. There is a hierarchy of SINC designations in place in London: Sites of Metropolitan Importance; Sites of Borough Importance; and Sites of Local Importance.

Within LB Ealing, the London Canals are considered to be of Metropolitan Importance. They are therefore considered to contain the best of examples of London's habitat and are hence the highest priority for protection. Horsenden Hill, Yeading Brook and Islip Manor are also similarly graded.

These non-NSN sites are important to consider as they contain habitats that may act as 'stepping stones' for movement of qualifying species from the NSN sites into LB Ealing.

**Figure 1 Ecological sites within LB Ealing.**



### 4.3 In-combination Plans and Projects

A list of plans and documents for review was provided within Appendix C of the IIA Scoping Report, which is still relevant for this Assessment. An in-combination and cumulative effects Assessment is presented in Table 4 in Section 5 of this report.

## 5. HRA Screening

### 5.1 Initial Screening of Policies

The initial stage will eliminate those policies from the Assessment that very clearly would not affect NSN sites. The eliminated policies are defined by the following criteria:

- The policy itself will not lead to development (e.g. it relates to design or is not a land use planning policy);
- No development could occur through the policy alone, because it is implemented through subordinate policies that are more detailed and therefore more appropriate to assess for their effects on the NSN site;
- There is no impact pathway to any of the NSN sites identified; and/or
- The policy is intended to protect the natural environment, including biodiversity.

The following policies have been eliminated from the Assessment due to the reasons stated above:

- Policy CO: Carbon Offsetting
- Policy DAA: Design and Amenity
- Policy FLP: Funding the Local Plan
- Policy SSC: Small Sites Contribution

All other policies will be assessed through the detailed Screening process outlined in the following section.

### 5.2 Detailed Screening

The detailed Screening of the LB Ealing Local Plan policies in relation to the NSN sites is presented in Table 4 and is based on the findings of the initial Screening exercise and the assessment of potential impacts, as mentioned in Section 5.1. Policies have been selected for their potential to trigger the need for Appropriate Assessment on the basis that there may be potential impact pathways to the NSN sites. This Screening also includes categorisation of the potential effects in line with guidance.

### 5.3 Assessment of Effects

#### 5.3.1 Air Quality

The policies outlined in section 3 of this HRA report could affect air quality during construction and operation. However, as three of the potentially affected NSN sites (South West London Waterbodies SPA and Ramsar, Richmond Park SAC and Wimbledon Common SAC) are within 10km of the boundary of the LB Ealing Local Plan area, it is impossible to quantify the amount of air pollution that can be contributed by the proposed development within the LB Ealing area during construction. It is therefore considered that the Town Policies and Development Management Policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation.

For operation, the aim of the LB Ealing Local Plan is to improve the town for local people. Therefore, it is anticipated that traffic from outside of the LB Ealing will not increase. However, this cannot be fully ascertained without traffic modelling being undertaken for the operational stage. The provision of more active travel routes should improve air quality locally, the benefit of which for the NSN sites closest to LB Ealing will be negligible. Additionally, Development Management Policies could lead to increased emissions from buildings. However, Policy CO: Carbon Offsetting will be designed such that LB Ealing is committed to

meeting carbon neutral targets by 2030, therefore there are no predicted air quality impacts associated with operation.

### 5.3.2 Water Pollution and Use

The policies outlined in section 3 of this HRA report could affect water pollution and use during construction and operation. However, waterbodies and watercourses within the LB Ealing are not connected via any water way to any of the NSN sites (non-NSN sites do not provide an ecological connection) and any associated demands on water supply will be minimised (as far as a local authority can influence this) through the implementation of Policy SP.2 Tackling the Climate Crisis. This Policy supports measures to reduce water demand via sustainable design and construction techniques including requiring new developments to significantly reduce water consumption.

For operation, water levels within the South West London Waterbodies SPA and Ramsar reservoirs already fluctuate considerably depending on existing usage and flows within the River Thames, and the amount of water that Thames Water can extract is agreed in advance with the Environment Agency. Also, the site's two qualifying migratory bird species: gadwall *Anas strepera strepera* and Northern European shoveler *Anas clypeata* rely on shallow water edges and where water depths are not so great that they prevent feeding. In addition, the site is identified by Thames Water as a Site of Biodiversity Interest meaning they have committed to enhancing biodiversity by 5% between 2020 and 2025 and by a further 5% into 2030. Thames Water are also bound by Section 3 of the Water Industry Act 1991 which sets out general environmental and recreational duties for water and wastewater undertakers. These duties include a requirement to further the conservation and enhancement of natural beauty and the conservation of flora, fauna and geological or physiographical features of special interest. Also, under Section 40 of the Natural Environment and Rural Communities Act 2006 Thames Water must have regard to restoring and enhancing biodiversity. In relation to future demands for water, Thames Water are preparing a new Water Resource Management Plan (WRMP) which is updated every five years. The current WRMP is WRMP19 and consultation on the new WRMP is due to commence in November 2022. In response to the serious water security challenge facing the south-east of England, Thames Water are working as part of an alliance of six water companies, named Water Resources South East, to develop a plan for a safe and dependable water supply for future generations taking account of issues including climate change and population growth. The WRMP work and new solutions identified through the WRSE look to ensure that new resources are developed to supplement the existing water resources serving London and the south-east to address the challenges of population growth and climate change. This includes provision of new reservoirs in the future, in the event that existing reservoirs (i.e. South West London Waterbodies) can no longer provide sufficient water supply. Given all of this, any future water abstraction is therefore unlikely to change the status quo for this NSN site.

### 5.3.3 Recreation

The policies outlined in section 3 of this HRA report could affect recreation during operation. However, in the case of LB Ealing, the probability of residents and employees from the LB Ealing Local Plan area increasing recreational pressure (and hence knock-on impacts including waste, disturbance and erosion) on the NSN sites is considered insignificant, primarily due to distance, and also due to the presence of non-NSN sites within LB Ealing. Not only are most of the sites beyond reasonable walking distance, there is good availability of alternative recreational space closer to employment and residential hubs. Additionally, the provision of public urban realm and investment in urban greening around active travel routes and improvement of connectivity to greenspace will provide more recreational space locally.

## 5.4 Further Recommendations

To reduce the potential for adverse effects on the integrity of NSN sites in the future, it is recommended that the following is implemented as part of the development management process:

- Any application coming forward within the LB Ealing should be subject to a detailed project level HRA where:
  - The proposed development involves or requires the abstraction of water from the South West London Waterbodies SPA and Ramsar reservoirs; and/or
  - An air quality assessment shows that a proposed development could result in significant effects on habitats within NSN sites.

## **6. Overall HRA Conclusion**

### **6.1 In-combination Effects**

The detailed Stage 1 Screening of the LB Ealing Local Plan policies has identified that the policies will have no significant effects on the qualifying features of the NSN sites, either on their own or in combination with other plans or projects.

### **6.2 Conclusion**

This Stage 1 Screening of the LB Ealing Local Plan policies has considered the potential implications of the plan for NSN sites near to the borough boundary. It is important to note that none of the policies set out in the LB Ealing Local Plan would lead to direct impacts upon NSN sites. The significance of the potential effects was assessed taking into account clearly-established and uncontroversial standard construction industry practices that are required by current UK legislation.

Although it is proposed that this assessment should not progress to Stage 2 of the HRA process (Appropriate Assessment), it is recommended that any future development applications within the LB Ealing should be subject to a detailed project level HRA, to reduce the residual potential for adverse effects on the NSN sites over time.

In particular, a project level HRA should be carried out if the proposed development involves or requires abstraction of water (from the South West London Waterbodies SPA and Ramsar reservoirs) and/or an air quality assessment shows that the proposed development could result in significant effects on habitats within NSN sites.

Table 3 Detailed Screening of the LB Ealing Local Plan policies.

Potential Effects		In-combination effects with other plans or projects	European Sites Potentially Affected	Conclusion of Likely Significant Effects (LSE) at this stage	Policies
Town Policies					
CONSTRUCTION	<p><i>Air quality</i></p> <p>Development associated with the following policies could have an adverse effect on air quality due to construction traffic emissions and the release of dust and other particulates during construction activities:</p> <ul style="list-style-type: none"><li>– mixed and commercial developments for employment and recreation around town centres <sup>1</sup></li><li>– reconfiguring transport routes <sup>2</sup></li><li>– new and affordable housing <sup>3</sup></li><li>– affordable workspaces <sup>4</sup></li><li>– the development of active travel routes <sup>5</sup></li><li>– improvement of public transport <sup>6</sup></li><li>– masterplan-led intensifications of Locally Significant Industrial Sites <sup>7</sup></li><li>– developments within the Strategic Industrial Locations <sup>8</sup></li><li>– regeneration of heritage and conservation areas, and shop fronts of town centres and around stations <sup>9</sup></li><li>– social infrastructure <sup>10</sup></li><li>– green space accessibility and public realm improvements <sup>11</sup></li></ul> <p>As three of the potentially affected NSN sites (Section 4) are within 10km of the boundary of the LB Ealing Local Plan area, it is impossible to predict the amount of air pollution that will be generated by the proposed developments within the LB Ealing area during construction, which may ultimately affect the NSN sites. However together these policies provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p> <p><i>Water pollution and use</i></p> <p>Policies that promote development (Policies <sup>1-11</sup>) could lead to water pollution from construction traffic and during construction activities. Construction could also place increased demands on water leading to abstraction. However, waterbodies and watercourses within the LB Ealing are not connected via any water way to any of the NSN sites (non-NSN sites do not provide an ecological connection) and any associated demands on water supply will be minimised (as far as a local authority can influence this) through the implementation of Policy SP.2 Tackling the Climate Crisis, which supports measures to reduce water demand via sustainable design and construction techniques including requiring new developments to significantly reduce water consumption.</p>	<p>Land allocation for the development of employment, housing and mixed-use areas is in line with the requirements of the London Plan, which has also been subject to an HRA process. Policy 7.19 of the London Plan requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effects on the integrity of any identified NSN sites.</p> <p>The policies and proposals contained within both the Mayor’s Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on NSN sites in the medium to long term. However, these policies are not explicitly described within the LB Ealing Local Plan.</p> <p>South West London Waterbodies SPA and Ramsar are identified by Thames Water as a Site of Biodiversity Interest meaning they have committed to enhancing biodiversity by 5% between 2020 and 2025 and by a further 5% into 2030. Thames Water are also bound by Section 3 of the Water Industry Act 1991 which sets out general environmental and recreational duties for water and wastewater undertakers. These duties include a requirement to further the conservation and enhancement of natural beauty and the conservation of flora, fauna and geological or physiographical features of special interest. Also, under Section 40 of the Natural Environment and Rural Communities Act 2006 Thames Water must have regard to restoring and enhancing biodiversity. In relation to future demands for water, Thames Water are preparing a new Water Resource Management Plan (WRMP) which is updated every five years. The current WRMP is WRMP19 and consultation on the new WRMP is due to commence in November 2022. In response to the serious water security challenge facing the south east of England, Thames Water are working as part of an alliance of six water companies, named Water Resources South East, to develop a plan for a safe and dependable water supply for</p>	<p>South West London Waterbodies SPA and Ramsar</p> <p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p>	<p><b>No LSE*</b></p>	<p>The following Town Policies (abbreviations only – full names provided below) all guide business and residential development within the LB Ealing Local Plan area and, as the impacts are of a similar type, they have been considered together:</p> <p><sup>1</sup> A.2, A.5, H.2, P.2, P.3, P.4, G.2, G.3, G.4, G.5, N.2, N.3, S.2, S.4, S.5</p> <p><sup>2</sup> N.3</p> <p><sup>3</sup> A.1, A.3, A.4, E.1, G.1, H.1, N.1, P.1, S.1, S.4, S.5</p> <p><sup>4</sup> A.4, E.2, S.4, S.5</p>



Potential Effects		In-combination effects with other plans or projects	European Sites Potentially Affected	Conclusion of Likely Significant Effects (LSE) at this stage	Policies		
OPERATION	<p><i>Air quality</i></p> <p>Policies that promote development of mixed-use areas for employment and recreation (Policies <sup>1-11</sup>) could have an adverse effect on air quality due to increased traffic emissions during operation. The aim of the LB Ealing Local Plan is to improve the town for local people. Therefore, it is anticipated that traffic from outside of the LB Ealing will not increase. However, this cannot be fully ascertained without traffic modelling being undertaken for the operational stage. The provision of more active travel routes should improve air quality locally, the benefit of which for the NSN sites closest to LB Ealing will be negligible. Additionally, provision of new and mixed development (Policies <sup>1-11</sup>) could lead to increased emissions from new buildings. However, Policy CO: Carbon Offsetting will be designed such that LB Ealing is committed to meeting carbon neutral targets by 2030, therefore there are no predicted air quality impacts associated with operation of new buildings. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p>	<p>future generations taking account of issues including climate change and population growth. The WRMP work and new solutions identified through the WRSE look to ensure that new resources are developed to supplement the existing water resources serving London and the south east to address the challenges of population growth and climate change. This includes provision of new reservoirs in the future, in the event that existing reservoirs (i.e. South West London Waterbodies) can no longer provide sufficient water supply.</p>			<p><sup>5</sup> A.3, A.4, A.6, E.2, E.3, E.4, P.2, P.3, P.4, G.2, G.3, G.5, N.3, S.3, S.4, S.5</p> <p><sup>6</sup>P.3; N.2, N.3, S.2</p>		
	<p><i>Water pollution and use</i></p> <p>Policies that promote development of new homes, mixed-use areas for employment and recreation and areas for enterprises (Policies <sup>1-11</sup>) could contribute to increased demands on water supply in the area within and surrounding LB Ealing. The NSN site South West London Waterbodies SPA and Ramsar is a collection of reservoirs and former gravel pits that support internationally important numbers of wintering wildfowl. The reservoirs form part of the Thames Water supply network and are filled with water abstracted from the River Thames which is then stored prior to being treated and put into supply. Increased water abstraction could potentially impact the NSN site by altering the water level regimes and hence reduce available food sources and suitable overwintering habitat areas for the site’s two qualifying migratory species: gadwall <i>Anas strepera strepera</i> and Northern European shoveler <i>Anas clypeata</i>. This could potentially cause a decline in their populations through species mortality. However, water levels within the reservoirs already fluctuate considerably depending on existing usage and flows within the River Thames, and the amount of water that Thames Water can extract is agreed in advance with the Environment Agency. Also, these bird species rely on shallow water edges and where water depths are, on the one hand, sufficient to support aquatic plants (which they feed on), but not in waters so deep that, either no aquatic plants can grow, or the birds cannot reach the plants to feed. Given all of this (plus the measure put in place by Thames Water (see in-combination effects) any future water abstraction is therefore unlikely to change the status quo for this NSN site.</p>	<p>It is therefore concluded that the implementation of policies<sup>1-11</sup> will have no significant adverse impacts on the conservation objectives relating to the qualifying species of the NSN sites in combination with other plans or projects.</p>			<p><sup>7</sup> A.3, E.3</p> <p><sup>8</sup>E.3, H.2</p> <p><sup>9</sup> A.2, A.5, E.4, H.2, G.2, G.4, G.5, N.2, S.2, S.3, S.5</p> <p><sup>10</sup> A.3, A.4, A.6, E.2, E.3, E.4, G.2, G.3, G.5, N.2, N.3, S.2, S.4, S.5</p> <p><sup>11</sup> A.2, A.4, A.5, A.6, E.2, E.4, P.2, P.4, G.2, G.3, N.2, N.3, S.2, S.3</p>		
	<p><i>Recreation</i></p> <p>Policies that encourage recreation (Policies <sup>1-11</sup>) may have an impact on NSN sites via knock-on impacts from recreation including waste, disturbance and erosion. In the case of LB Ealing, the probability of residents and employees from the LB Ealing Local Plan area increasing recreational pressure on the NSN sites is considered insignificant, primarily due to distance, and also due to the presence of non-NSN sites within LB Ealing. Not only are most of the sites beyond reasonable walking distance, there is good availability of alternative recreational space closer to employment and residential hubs. Additionally, the provision of public urban realm and investment in urban greening around active travel routes and improvement of connectivity to greenspace will provide more recreational space locally.</p>						
	<p><i>*To ensure these policies are implemented effectively in the future, it is recommended that all new development projects within the LB Ealing would need to be subject to independent HRAs to determine whether any potential impacts are likely to trigger LSEs on any of the NSN sites.</i></p>						
<p><i>Town Policies – Full Names</i></p>							
Acton Town		Ealing Town	Greenford Town	Hanwell Town	Northolt Town	Perivale Town	Southall Town
A.1: Acton Spatial Strategy		E.1: Ealing Spatial Strategy	G.1: Greenford Spatial Strategy	H.1: Hanwell Spatial Strategy	N.1: Northolt Spatial Strategy	P.1: Perivale Spatial Strategy	S.1: Southall Spatial Strategy
A.2: Acton Town Centre		E.2: Ealing Metropolitan Town Centre	G.2: Greenford Town Centre	H.2: Hanwell Town Centre	N.2: Northolt neighbourhood town centre	P.2: Bilton Road neighbourhood centre	S.2: Southall Town Centre
A.3: South Acton		E.3: Northern Ealing	G.3: Westway Cross neighbourhood centre		N.3: White Hart neighbourhood centre	P.3: Medway Parade local centre	S.3: King Street neighbourhood centre
A.4: Acton Main Line Station and environs		E.4: Southern Ealing and Ealing Common	G.4: Sudbury Hill neighbourhood centre			P.4: Perivale Station local centre	S.4: West Southall
A.5: East Acton neighbourhood centre							S.5: East Southall
A.6: North Acton			G.5: Greenford Station local centre				



Potential Effects		In-combination effects with other plans or projects	European Sites Potentially Affected	Conclusion of Likely Significant Effects (LSE) at this stage	Policies
Development Management Policies - Buildings					
CONSTRUCTION	<p><i>Air quality</i></p> <p>Policies that promote the development of tall buildings<sup>12</sup>, affordable workspace<sup>13</sup>, enabling development<sup>14</sup> large scale purpose built shared living<sup>15</sup>, affordable housing<sup>16</sup> and town centres<sup>17</sup> could have an adverse effect on air quality during construction, specifically dust and other particles released during construction activities and also via construction traffic emissions. As three of the potentially affected NSN sites (Section 4) are within 10km of the boundary of the LB Ealing Local Plan area, it is impossible to predict the amount of air pollution that will be generated by the proposed development within the LB Ealing area during construction, which may ultimately affect the NSN sites. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p> <p><i>Water pollution and use</i></p> <p>Construction activities associated with Policies<sup>12-17</sup> could lead to water pollution from construction traffic and during construction activities. Construction could also place increased demands on water leading to abstraction. However, waterbodies and watercourses within the LB Ealing are not connected via any water way to any of the NSN sites (non-NSN sites do not provide an ecological connection) and any associated demands on water supply will be minimised (as far as a local authority can influence this) through the implementation of Policy SP.2 Tackling the Climate Crisis, which supports measures to reduce water demand via sustainable design and construction techniques including requiring new developments to significantly reduce water consumption.</p>	<p>Land allocation for the development of employment, housing and mixed-use areas is in line with the requirements of the London Plan, which has also been subject to an HRA process. Policy 7.19 of the London Plan requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effect on the integrity of any identified NSN sites.</p> <p>The policies and proposals contained within both the Mayor’s Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on NSN sites in the medium to long term. However, these policies are not explicitly described within the LB Ealing Local Plan.</p> <p>South West London Waterbodies SPA and Ramsar are identified by Thames Water as a Site of Biodiversity Interest meaning they have committed to enhancing biodiversity by 5% between 2020 and 2025 and by a further 5% into 2030. Thames Water are also bound by Section 3 of the Water Industry Act 1991 which sets out general environmental and recreational duties for water and wastewater undertakers. These duties include a requirement to further the conservation and enhancement of natural beauty and the conservation of flora, fauna and geological or physiographical features of special interest. Also, under Section 40 of the Natural Environment and Rural Communities Act 2006 Thames Water must have regard to restoring and enhancing biodiversity. In relation to future demands for water, Thames Water ae preparing a new Water Resource Management Plan (WRMP) which is updated every five years. The current WRMP is WRMP19 and consultation on the new WRMP is due to commence in November 2022. In response to the serious water security challenge facing the south east of England, Thames Water are working as part of an alliance of six water companies, named Water Resources South East, to develop a plan for a safe and dependable water supply for future generations taking account of issues including climate change and population growth. The WRMP work and new solutions identified through the WRSE look to ensure that new resources are developed to supplement the existing water resources serving London and the south east to address the challenges of population growth and climate change. This includes provision of new reservoirs in the future, in the event that existing reservoirs (i.e. South West London Waterbodies) can no longer provide sufficient water supply.</p> <p>It is therefore concluded that the implementation of policies<sup>12-17</sup> will have no significant adverse impacts on the conservation objectives relating to the qualifying species of the NSN sites in combination with other plans or projects.</p> <p><b>*To ensure these policies are implemented effectively in the future, it is recommended that all new development projects within the LB Ealing would need to be subject to independent HRAs to determine whether any potential impacts are likely to trigger LSEs on any of the NSN sites.</b></p>	<p>South West London Waterbodies SPA and Ramsar</p> <p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p>	No LSE	The following Development Management Policies are applicable to both air quality, water pollution, water use and recreation:
	<p><i>Air quality</i></p> <p>Policies that promote development of mixed-use areas for employment and recreation (Policies <sup>12-17</sup>) could have an adverse effect on air quality due to increased traffic emissions during operation. The aim of the LB Ealing Local Plan is to improve the town for local people. Therefore, it is anticipated that traffic from outside of the LB Ealing will not increase. However, this cannot be fully ascertained without traffic modelling being undertaken for the operational stage. The provision of more active travel routes should improve air quality locally, the benefit of which for the NSN sites closest to LB Ealing will be negligible. Additionally, Policies <sup>12-17</sup> could lead to increased emissions from buildings. However, Policy CO: Carbon Offsetting will be designed such that LB Ealing is committed to meeting carbon neutral targets by 2030, therefore there are no predicted air quality impacts associated with operation of new buildings. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p> <p><i>Water pollution and use</i></p> <p>Policies that promote development of buildings (Policies <sup>12-17</sup>) could contribute to increased demands on water supply in the area within and surrounding LB Ealing. The NSN site South West London Waterbodies SPA and Ramsar is a collection of reservoirs and former gravel pits that support internationally important numbers of wintering wildfowl. The reservoirs form part of the Thames Water supply network and are filled with water abstracted from the River Thames which is then stored prior to being treated and put into supply. Increased water abstraction could potentially impact the NSN site by altering the water level regimes and hence reduce available food sources and suitable overwintering habitat areas for the site’s two qualifying migratory bird species: gadwall <i>Anas strepera strepera</i> and Northern European shoveler <i>Anas clypeata</i>. This could potentially cause a decline in their populations through species mortality. However, water levels within the reservoirs already fluctuate considerably depending on existing usage and flows within the River Thames, and the amount of water that Thames Water can extract is agreed in advance with the Environment Agency. Also, these bird species rely on shallow water edges and where water depths are, on the one hand, sufficient to support aquatic plants (which they feed on), but not in waters so deep that, either no aquatic plants can grow, or the birds cannot reach the plants to feed. Given all of this (plus the measure put in place by Thames Water (see in-combination effects) any future water abstraction is therefore unlikely to change the status quo for this NSN site.</p> <p><i>Recreation</i></p> <p>Policies that encourage recreation (Policies <sup>12-17</sup>) may have an impact on NSN sites via knock-on impacts from recreation including waste, disturbance and erosion. In the case of LB Ealing, the probability of residents and employees from the LB Ealing Local Plan area increasing recreational pressure on the NSN sites is considered insignificant, primarily due to distance, and also due to the presence of non-NSN sites within LB Ealing. Not only are most of the NSN sites beyond reasonable walking distance, there is good availability of alternative recreational space closer to employment and residential hubs. Additionally, the provision of public urban realm and investment in urban greening around active travel routes and improvement of connectivity to greenspace will provide more recreational space locally.</p>				<p><sup>12</sup> D9: Tall Buildings</p> <p><sup>13</sup> E3: Affordable Workspace</p> <p><sup>14</sup> ENA: Enabling Development</p> <p><sup>15</sup> H16: Large Scale Purpose Built Shared Living</p> <p><sup>16</sup> HOU: Affordable Housing</p> <p><sup>17</sup> TCS: Town Centres</p> <p>Policies HOU and E3 have also been translated into individual town policies, described above.</p>

Potential Effects		In-combination effects with other plans or projects	European Sites Potentially Affected	Conclusion of Likely Significant Effects (LSE) at this stage	Policies
Development Management Policies - Industry					
CONSTRUCTION	<p><i>Air quality</i></p> <p>Policies that promote the development of land for industry, logistics and services<sup>18</sup> and locally significant industrial sites<sup>19</sup> could have an adverse effect on air quality during construction, specifically dust and other particles released during construction activities and also via construction traffic emissions. As three of the potentially affected NSN sites (Section 4) are within 10km of the boundary of the LB Ealing Local Plan area, it is impossible to predict the amount of air pollution that will be generated by the proposed development within the LB Ealing area during construction, which may ultimately affect the NSN sites. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p>	Land allocation for the development of employment and mixed-use areas is in line with the requirements of the London Plan, which has also been subject to an HRA process. Policy 7.19 of the London Plan requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effect on the integrity of any identified NSN sites.	South West London Waterbodies SPA and Ramsar	No LSE	The following Development Management Policies are applicable to both air quality, water pollution, water use and recreation:
	<p><i>Water pollution and use</i></p> <p>Construction activities associated with that promote the development of land for industry, logistics and services<sup>18</sup> and locally significant industrial sites<sup>19</sup> could lead to water pollution from construction traffic and during construction activities. Construction could also place increased demands on water leading to abstraction. However, waterbodies and watercourses within the LB Ealing are not connected via any water way to any of the NSN sites (and non-NSN sites do not provide an ecological connection) and any associated demands on water supply will be minimised (as far as a local authority can influence this) through the implementation of Policy SP.2 Tackling the Climate Crisis, which supports measures to reduce water demand via sustainable design and construction techniques including requiring new developments to significantly reduce water consumption.</p>	<p>The policies and proposals contained within both the Mayor’s Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on NSN sites in the medium to long term. However, these policies are not explicitly described within the LB Ealing Local Plan.</p> <p>South West London Waterbodies SPA and Ramsar are identified by Thames Water as a Site of Biodiversity Interest meaning they have committed to enhancing biodiversity by 5% between 2020 and 2025 and by a further 5% into 2030. Thames Water are also bound by Section 3 of the Water Industry Act 1991 which sets out general environmental and recreational duties for water and wastewater undertakers. These duties include a requirement to further the conservation and enhancement of natural beauty and the conservation of flora, fauna and geological or physiographical features of special interest. Also, under Section 40 of the Natural Environment and Rural Communities Act 2006 Thames Water must have regard to restoring and enhancing biodiversity. In relation to future demands for water, Thames Water are preparing a new Water Resource Management Plan (WRMP) which is updated every five years. The current WRMP is WRMP19 and consultation on the new WRMP is due to commence in November 2022. In response to the serious water security challenge facing the south east of England, Thames Water are working as part of an alliance of six water companies, named Water Resources South East, to develop a plan for a safe and dependable water supply for future generations taking account of issues including climate change and population growth. The WRMP work and new solutions identified through the WRSE look to ensure that new resources are developed to supplement the existing water resources serving London and the south east to address the challenges of population growth and climate change. This includes provision of new reservoirs in the future, in the event that existing reservoirs (i.e. South West London Waterbodies) can no longer provide sufficient water supply.</p> <p>It is therefore concluded that the implementation of policies<sup>18</sup> and <sup>19</sup> will have no significant adverse impacts on the conservation objectives relating to the qualifying species of the NSN sites in combination with other plans or projects.</p> <p><b>*To ensure these policies are implemented effectively in the future, it is recommended that all new development projects within the LB Ealing would need to be subject to independent HRAs to determine whether any potential impacts are likely to trigger LSEs on any of the NSN sites.</b></p>	Richmond Park SAC		
OPERATION	<p><i>Air quality</i></p> <p>Policies that promote the development of land for industry, logistics and services<sup>18</sup> and locally significant industrial sites<sup>19</sup> could have an adverse effect on air quality due to increased traffic emissions during operation. The aim of the LB Ealing Local Plan is to improve the town for local people. Therefore, it is anticipated that traffic from outside of the LB Ealing will not increase. However, this cannot be fully ascertained without traffic modelling being undertaken for the operational stage. The provision of more active travel routes should improve air quality locally, the benefit of which for the NSN sites closest to LB Ealing will be negligible. Additionally, Policies <sup>18</sup> and <sup>19</sup> could lead to increased emissions from industrial buildings. However, Policy CO: Carbon Offsetting will be designed such that LB Ealing is committed to meeting carbon neutral targets by 2030, therefore there are no predicted air quality impacts associated with operation of new buildings. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p>			No LSE	Policies E4 and E6 have also been translated into individual town policies, described above.
	<p><i>Water pollution and use</i></p> <p>Policies that promote the development of land for industry, logistics and services<sup>18</sup> and locally significant industrial sites<sup>19</sup> could contribute to increased demands on water supply in the area within and surrounding LB Ealing. The NSN site South West London Waterbodies SPA and Ramsar is a collection of reservoirs and former gravel pits that support internationally important numbers of wintering wildfowl. The reservoirs form part of the Thames Water supply network and are filled with water abstracted from the River Thames which is then stored prior to being treated and put into supply. Increased water abstraction could potentially impact the NSN site by altering the water level regimes and hence reduce available food sources and suitable overwintering habitat areas for the site’s two qualifying migratory bird species: gadwall <i>Anas strepera strepera</i> and Northern European shoveler <i>Anas clypeata</i>. This could potentially cause a decline in their populations through species mortality. However, water levels within the reservoirs already fluctuate considerably depending on existing usage and flows within the River Thames, and the amount of water that Thames Water can extract is agreed in advance with the Environment Agency. Also, these bird species rely on shallow water edges and where water depths are, on the one hand, sufficient to support aquatic plants (which they feed on), but not in waters so deep that, either no aquatic plants can grow, or the birds cannot reach the plants to feed. Given all of this (plus the measure put in place by Thames Water (see in-combination effects) any future water abstraction is therefore unlikely to change the status quo for this NSN site.</p> <p><i>Recreation</i></p> <p>Policies that promote the development of land for industry, logistics and services<sup>18</sup> and locally significant industrial sites<sup>19</sup> may have an impact on NSN sites via knock-on impacts from recreation including waste, disturbance and erosion. In the case of LB Ealing, the probability of employees from the LB Ealing Local Plan area increasing recreational pressure on the NSN sites is considered insignificant, primarily due to distance, and also due to the presence of non-NSN sites within LB Ealing. Not only are most of the sites beyond reasonable walking distance, there is good availability of alternative recreational space closer to employment and residential hubs. Additionally, the provision of public urban realm and investment in urban greening around active travel routes and improvement of connectivity to greenspace will provide more recreational space locally.</p>				

Potential Effects		In-combination effects with other plans or projects	European Sites Potentially Affected	Conclusion of Likely Significant Effects (LSE) at this stage	Policies
Development Management Policies – Open Space & Urban Greening					
CONSTRUCTION	<p><i>Air quality</i></p> <p>Policies that promote open space<sup>20</sup> and urban greening<sup>21</sup> could have an adverse effect on air quality during construction, specifically dust and other particles released during construction activities and also via construction traffic emissions. As three of the potentially affected NSN sites (Section 4) are within 10km of the boundary of the LB Ealing Local Plan area, it is impossible to predict the amount of air pollution that will be generated by the proposed development within the LB Ealing area during construction, which may ultimately affect the NSN sites. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p>	<p>Land allocation for the development of employment and mixed-use areas is in line with the requirements of the London Plan, which has also been subject to an HRA process. Policy 7.19 of the London Plan requires that implementation of the policies and proposals of the plan must be done in a way which avoids adverse effect on the integrity of any identified NSN sites.</p>	<p>South West London Waterbodies SPA and Ramsar</p>	No LSE	<p>The following Development Management Policies are applicable to air quality:</p> <p><sup>20</sup> G4: Open Space</p> <p><sup>21</sup> G5: Urban Greening</p> <p>Policies G4 and G5 have also been translated into individual town policies, described above.</p>
	<p><i>Water pollution and use</i></p> <p>Construction activities associated with that promote open space<sup>20</sup> and urban greening<sup>21</sup> could lead to water pollution from construction traffic and during construction activities. Construction could also place increased demands on water leading to abstraction. However, waterbodies and watercourses within the LB Ealing are not connected via any water way to any of the NSN sites (non-NSN sites do not provide an ecological connection) and any associated demands on water supply will be minimised (as far as a local authority can influence this) through the implementation of Policy SP.2 Tackling the Climate Crisis, which supports measures to reduce water demand via sustainable design and construction techniques including requiring new developments to significantly reduce water consumption.</p>	<p>The policies and proposals contained within both the Mayor’s Air Quality Strategy and the Draft Water Resource Management promote the improvement of air quality and water resource management, which should also help reduce any adverse impacts on NSN sites in the medium to long term. However, these policies are not explicitly described within the LB Ealing Local Plan.</p>	<p>Richmond Park SAC</p> <p>Wimbledon Common SAC</p>		
OPERATION	<p><i>Air quality</i></p> <p>Policies that promote open space<sup>20</sup> and urban greening<sup>21</sup> could have an adverse effect on air quality due to increased traffic emissions during operation from people travelling to these spaces for recreational purposes. The aim of the LB Ealing Local Plan is to improve the town for local people. Therefore, it is anticipated that traffic from outside of the LB Ealing will not increase. However, this cannot be fully ascertained without traffic modelling being undertaken for the operational stage. The provision of more active travel routes should improve air quality locally, the benefit of which for the NSN sites closest to LB Ealing will be negligible. Additionally, Policies <sup>20</sup> and <sup>21</sup> could lead to increased emissions from buildings associated with open space and urban greening. However, Policy CO: Carbon Offsetting will be designed such that LB Ealing is committed to meeting carbon neutral targets by 2030, therefore there are no predicted air quality impacts associated with operation of new buildings. It is therefore considered these policies together provide a coherent strategy to maximise air quality improvement within the LB Ealing by ensuring that new developments: a) do not lead to a further deterioration of existing air quality; b) contribute to improved air quality where possible; c) avoid exposure to unacceptable levels of poor air quality; and/or d) incorporate design solutions to minimise increased exposure. This strategy applies to both construction and operation and should ensure that developments that adhere to these policies will not worsen exiting air quality effects on the NSN sites.</p>	<p>South West London Waterbodies SPA and Ramsar are identified by Thames Water as a Site of Biodiversity Interest meaning they have committed to enhancing biodiversity by 5% between 2020 and 2025 and by a further 5% into 2030. Thames Water are also bound by Section 3 of the Water Industry Act 1991 which sets out general environmental and recreational duties for water and wastewater undertakers. These duties include a requirement to further the conservation and enhancement of natural beauty and the conservation of flora, fauna and geological or physiographical features of special interest. Also, under Section 40 of the Natural Environment and Rural Communities Act 2006 Thames Water must have regard to restoring and enhancing biodiversity. In relation to future demands for water, Thames Water are preparing a new Water Resource Management Plan (WRMP) which is updated every five years. The current WRMP is WRMP19 and consultation on the new WRMP is due to commence in November 2022. In response to the serious water security challenge facing the south east of England, Thames Water are working as part of an alliance of six water companies, named Water Resources South East, to develop a plan for a safe and dependable water supply for future generations taking account of issues including climate change and population growth. The WRMP work and new solutions identified through the WRSE look to ensure that new resources are developed to supplement the existing water resources serving London and the south east to address the challenges of population growth and climate change. This includes provision of new reservoirs in the future, in the event that existing reservoirs (i.e. South West London Waterbodies) can no longer provide sufficient water supply.</p> <p>It is therefore concluded that the implementation of policies<sup>20</sup> and <sup>21</sup> will have no significant adverse impacts on the conservation objectives relating to the qualifying species of the NSN sites in combination with other plans or projects.</p> <p><b>*To ensure these policies are implemented effectively in the future, it is recommended that all new development projects within the LB Ealing would need to be subject to independent HRAs to determine whether any potential impacts are likely to trigger LSEs on any of the NSN sites.</b></p>			