ARUP

# Ealing Local Plan

## Integrated Impact Assessment – Non-technical Summary

**February 2024**

287323-10

# Introduction

## Background

- Ove Arup and Partners Limited (Arup) has been appointed to conduct an Integrated Impact Assessment (IIA) of the proposed Ealing Local Plan.
- This non-technical summary identifies the component assessments undertaken for the Local Plan and that are presented in the full IIA report. It also describes the key findings of the IIA process.

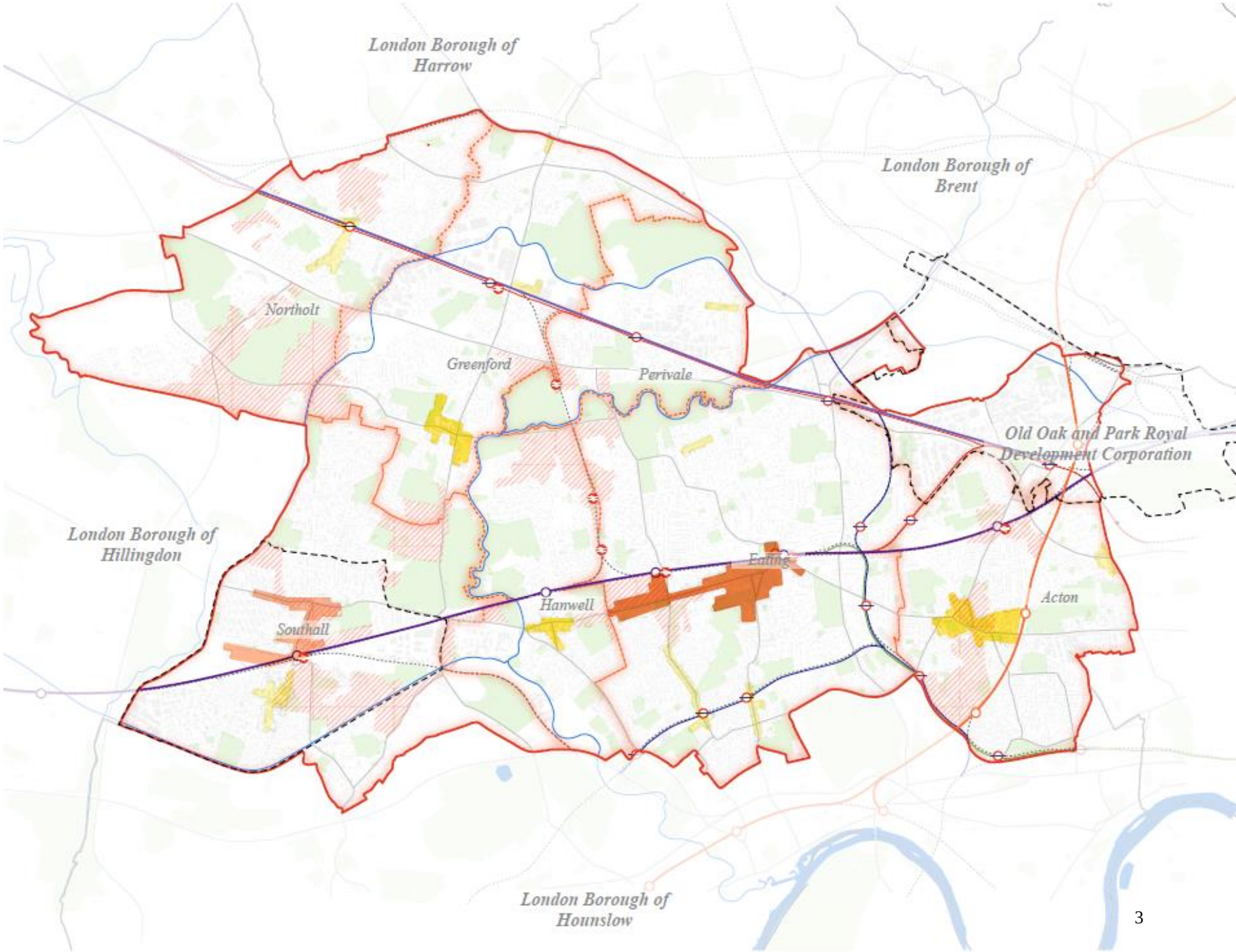
## Ealing Local Plan

- The London Borough of Ealing (LB Ealing) Local Plan provides a framework of planning policies to guide development within LB Ealing for the next 15 years. As part of the preparation of the Local Plan, an Integrated Impact Assessment has been carried out. This report describes the Integrated Impact Assessment (IIA) process and reports the results of the assessment.

## 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.

LB Ealing is located in west London. The borough comprises seven broad towns, each with their own character: Acton, Ealing, Greenford, Hanwell, Northolt, Perivale and Southall.



# Assessment of Options

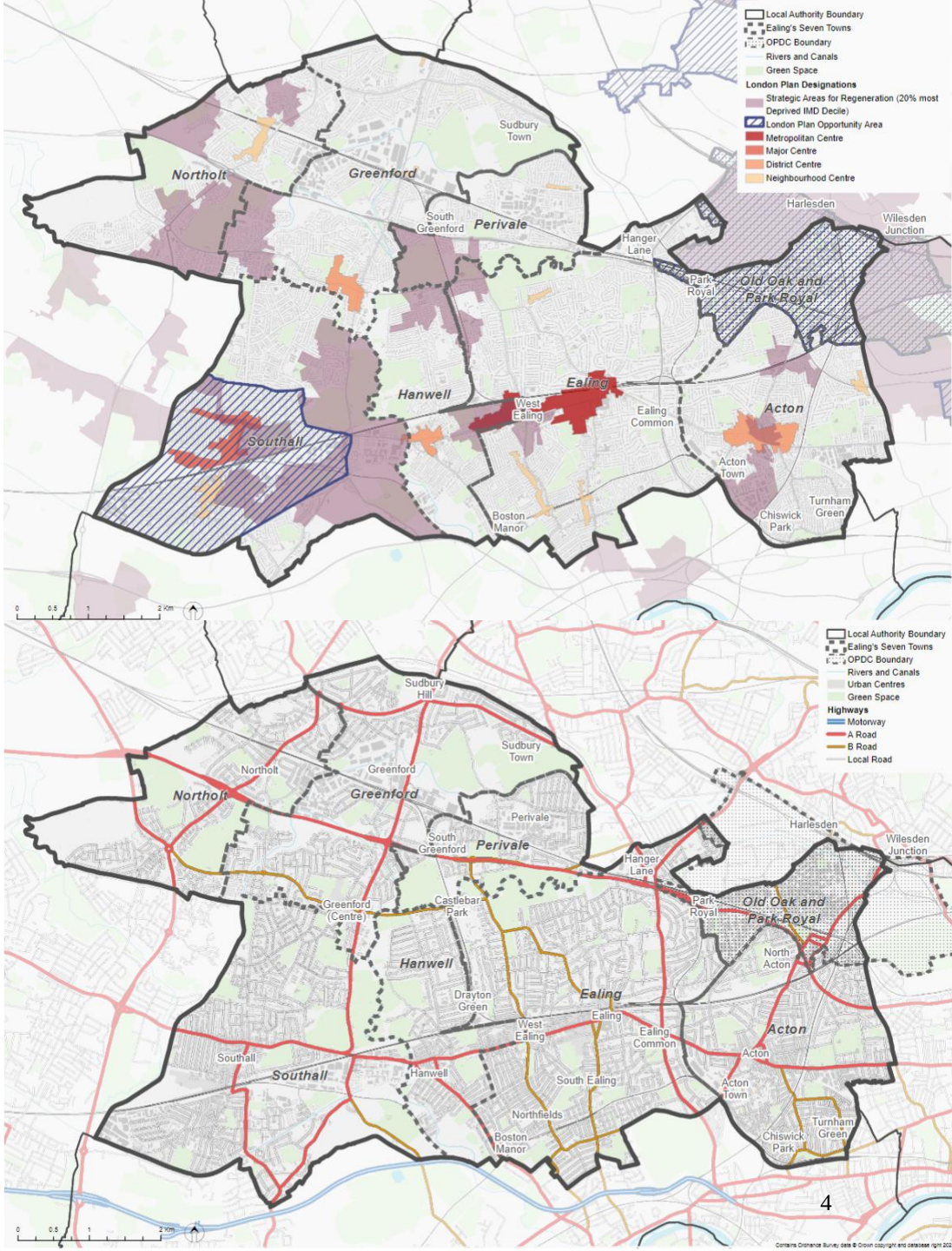
## Overview of assessment

The development and assessment of spatial options to identify a preferred growth strategy is a fundamental building block to developing the strategic policies in a Local Plan and the assessment forms part of the evidence base of the Local Plan.

The initial phase of the assessment presented three ‘reasonable alternative’ options for growth that could guide the long-term development of LB Ealing. The three spatial options that were developed are:

- Option 1: Strategic Corridor Focus.
- Option 2: Network Connectivity Focus.
- Option 3: Neighbourhood Centre Focus

The IIA assessment considered the potential environmental, social and economic effects of each Spatial Option

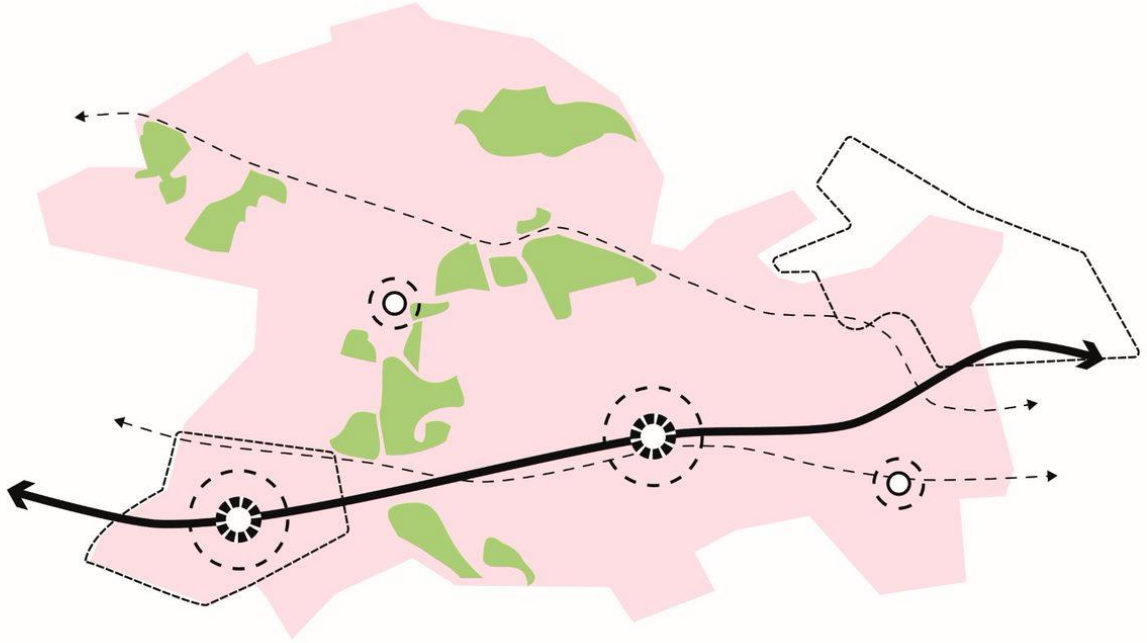


# Assessment of Options

## Option 1: Strategic Corridor Focus

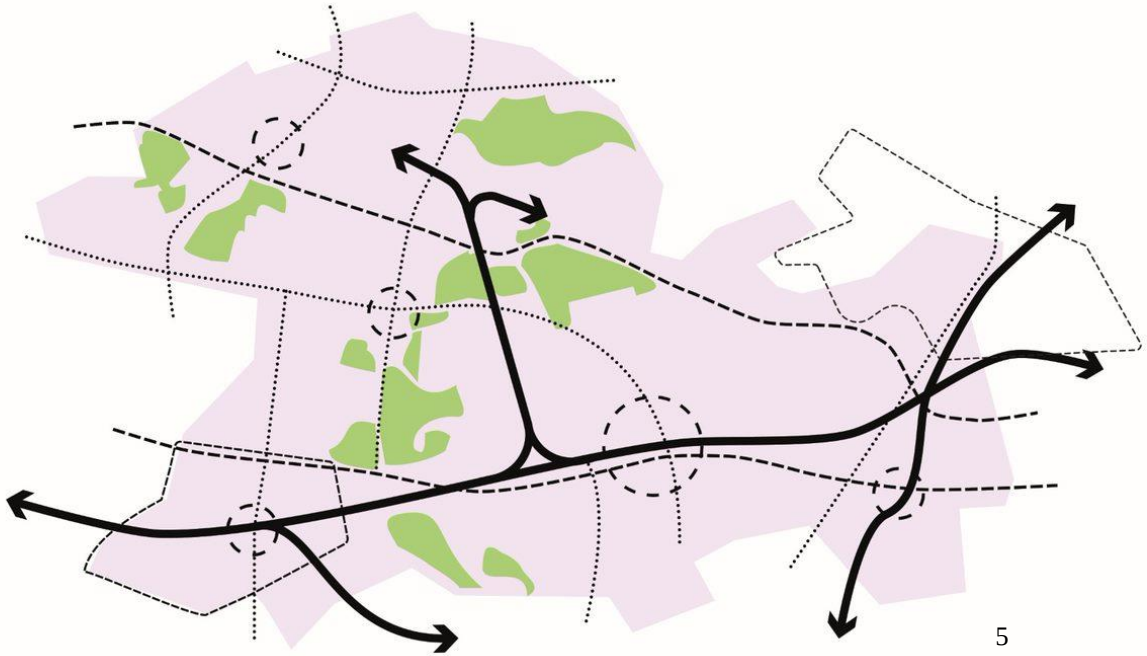
- Spatial Option 1 aims to focus growth along the Elizabeth Line Corridor and A4020 Corridor that intersect with the borough's Opportunity Area and Metropolitan Centre. This Spatial Option therefore intends to **reinforce the historic pattern of growth and development** within Ealing by maximising development 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.

- This option scored positively for housing, economy and health. However, scored negatively for heritage and townscape due to the proposed significant levels of development in Ealing Metropolitan Centre which will likely lead to tall buildings.



## Option 2: Network Connectivity Focus

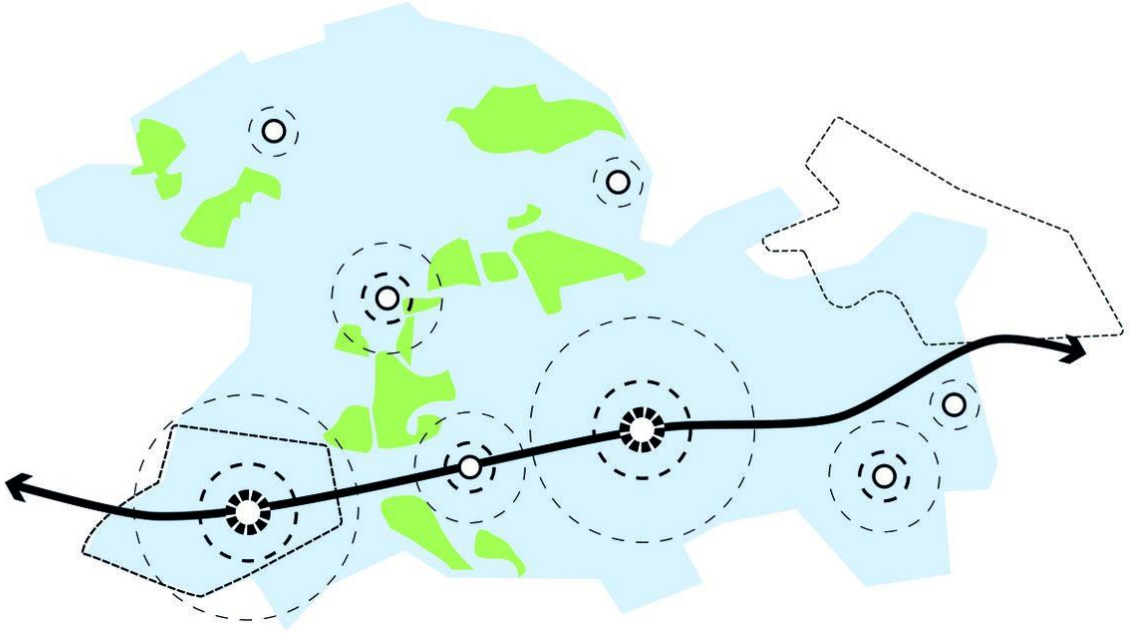
- Spatial Option 2 looks to prioritise **north-south connectivity**, to counterbalance with east-west connectivity. This provides a response to the London Plan that incorporates strategic priorities of east-west connectivity to the Central Activity Zone and Heathrow Airport while addressing the **local sustainable connectivity issues** within Ealing.
- This option scores positively for housing, economy, health, connectivity, air quality and noise and did not receive any negative scores.



# Assessment of Options

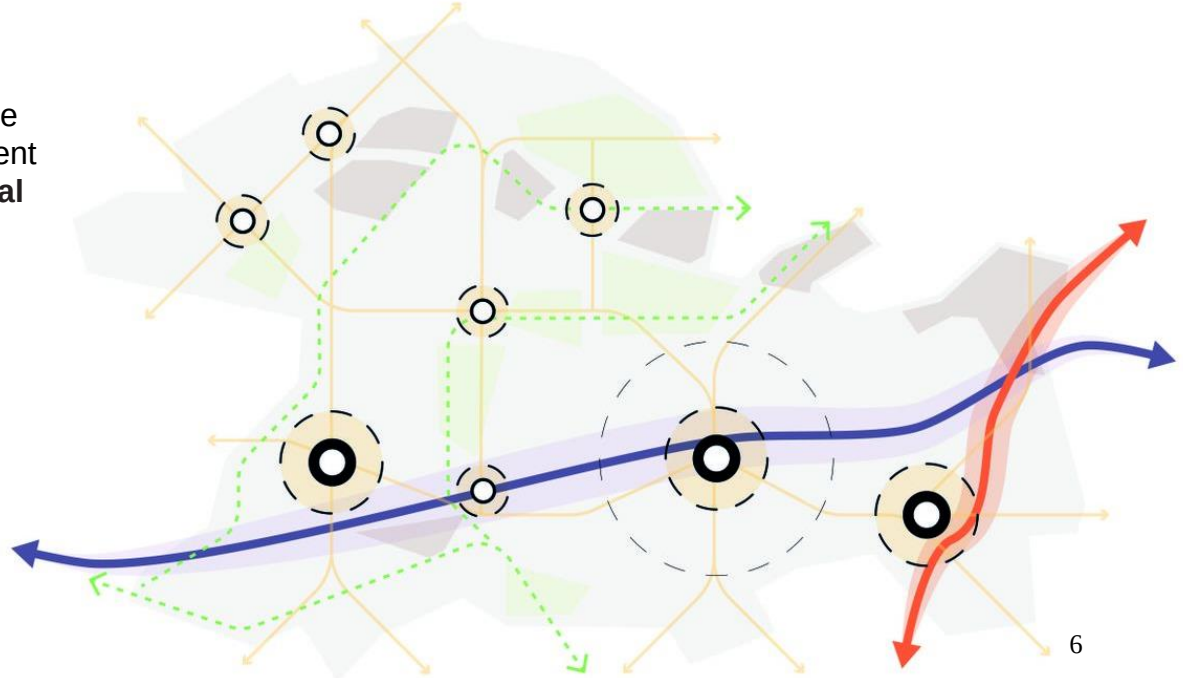
## Option 3: Neighbourhood Centre Focus

- Spatial Option 3 focuses on delivering growth within Ealing's **neighbourhood centres** to provide a more equal provision of infrastructure and opportunity (i.e., connectivity, economic opportunity, social infrastructure) across the borough. The Spatial Option promotes a **multi-centred ('polycentric) approach to urban development** that will look to deliver growth from Metropolitan Centres to Neighbourhood Centres.
- This option scores positively for housing, economy, health, connectivity, air quality and noise, resources and land use, and climate change mitigation, with neutral scores or insufficient information to score the remaining criteria.



## Option 4: Ealing Growth Strategy

- The IIA recommendations for Options 1, 2 and 3, based on the scoring against the social, environmental and economic criteria, directly contributed to the development of Option 4 (i.e., Preferred Option) which **combines elements of all three Spatial Options**.
- Option 4 recognises that each town in LB Ealing will have a different role in accommodating the growth and development of the borough and has three main principles:
  - delivering growth along transport corridors
  - focussing on neighbourhood centres
  - promoting sustainable connectivity.
- This option scored positively against all of the framework objectives and is the **preferred option**.

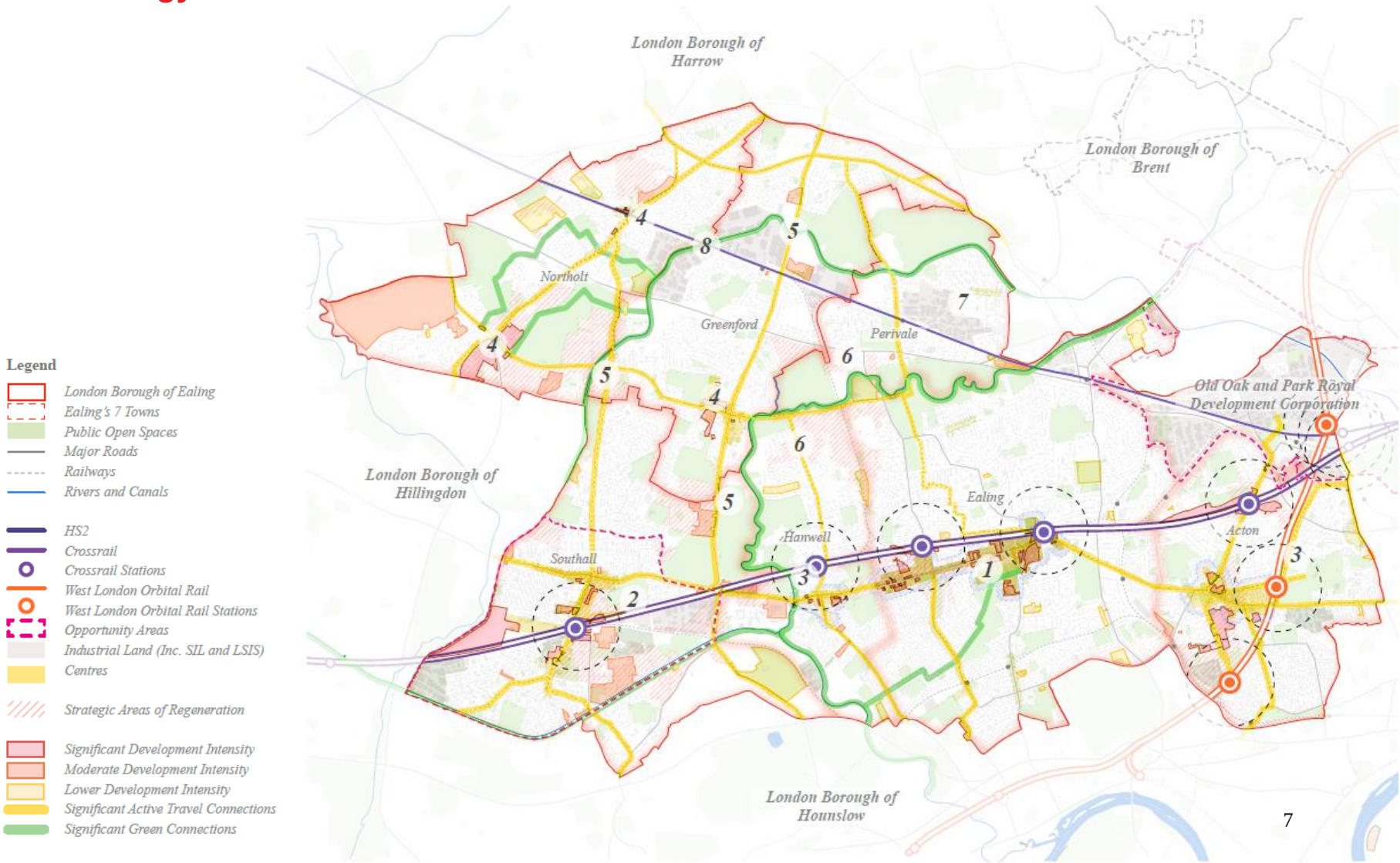


# Assessment of Options

## Preferred Option – Ealing Growth Strategy

To deliver the preferred spatial option, the following spatial interventions were identified:

1. Significant levels of development at Ealing Metropolitan Centre.
2. Moderate levels of development over and above the committed development pipeline at Southall Opportunity Area.
3. Significant levels of development in the vicinity of Elizabeth Line and West London Orbital stations.
4. Significant levels of development in the centres of Greenford, Northolt and White Hart Roundabout.
5. Moderate levels of development along the key north-south corridors in the north and west of the borough.
6. Lower levels of development in Hanwell and Perivale.
7. Investment in sustainable connectivity between strategic green space network, neighbourhood centres and industrial sites.
8. Maintaining and transforming existing Strategic Industrial Land and Locally Significant Industrial Land.



# Assessment of policies

## Approach

The draft Local Plan policies have been assessed to determine whether or not they meet the objectives of the IIA framework using the scoring criteria set out below. The IIA framework and scoring criteria were established during scoping in consultation with Ealing Council.

The assessment is based on professional judgement, using the guiding questions set out in the framework, best practise and relevant evidence to anticipate the scale of change and its impact resulting from the policy intervention. In the main report, the scoring is supported by a concise narrative providing justification for the evaluation.

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

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

# Assessment of policies

## Strategic Policies

IIA Framework Objectives

| Policy | Housing and communities | Economy | Education and skills | Health | Connectivity | Air quality and noise | Resources and land use | Historic environment, culture and townscape | Biodiversity and Green Infrastructure | Water environment | Climate change mitigation | Climate change adaptation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Strategic Policies** | | | | | | | | | | | | |
| A Vision for Ealing | + | + | 0 | + | + | + | + | 0 | + | N/A | + | 0 |
| Tackling the climate crisis | + | + | N/A | + | + | + | + | + | + | + | + | + |
| Fighting inequality | + | + | + | + | + | + | + | + | + | N/A | + | + |
| Creating good jobs and growth | + | + | 0 | + | + | + | + | + | 0 | 0 | + | 0 |

- None of the Strategic Policies conflict with the IIA Framework Objectives.

# Assessment of policies

## Town Policies

IIA Framework Objectives

| Policy | Housing and communities | Economy | Education and skills | Health | Connectivity | Air quality and noise | Resources and land use | Historic environment, culture and townscape | Biodiversity and Green Infrastructure | Water environment | Climate change mitigation | Climate change adaptation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Town Policies** | | | | | | | | | | | | |
| Acton | + | + | + | + | + | + | + | + | + | 0 | + | + |
| Ealing | + | + | + | + | + | + | + | + | + | + | + | + |
| Greenford | + | + | 0 | + | + | + | + | + | + | + | + | + |
| Hanwell | + | + | 0 | + | + | + | + | + | + | 0 | + | + |
| Northolt | + | + | 0 | + | + | + | + | + | + | + | + | + |
| Perivale | + | + | 0 | + | + | + | + | 0 | + | 0 | + | + |
| Southall | + | + | + | + | + | + | + | + | + | 0 | + | + |

- None of the Town Policies conflict with the IIA Framework Objective.

# Assessment of policies

## Development Management Policies

IIA Framework Objectives

| Policy | Housing and communities | Economy | Education and skills | Health | Connectivity | Air quality and noise | Resources and land use | Historic environment, culture and townscape | Biodiversity and Green Infrastructure | Water environment | Climate change mitigation | Climate change adaptation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **DM Policies** | | | | | | | | | | | | |
| Design and Amenity | + | + | 0 | + | + | + | + | + | + | 0 | 0 | 0 |
| Tall Buildings | + | + | N/A | + | 0 | 0 | + | + | 0 | 0 | - | 0 |
| Affordable Housing | + | 0 | 0 | + | 0 | N/A | 0 | 0 | 0 | 0 | 0 | 0 |
| Large Scale Purpose Built Shared Living | + | 0 | 0 | + | + | + | + | 0 | 0 | 0 | 0 | 0 |
| Small Sites Contribution | + | + | 0 | + | 0 | N/A | 0 | 0 | 0 | 0 | 0 | 0 |
| Affordable Workspace | + | + | + | + | 0 | 0 | 0 | 0 | N/A | 0 | 0 | 0 |

- All of the DM policies (shown on this page) support the ‘Housing and Communities’ and ‘Health’ objectives of the IIA Framework which will likely lead to improvements in these areas across the borough.
- The ‘Tall Buildings’ policy conflicts with the IIA framework ‘Climate Change Mitigation’ objective because tall buildings are usually new build development which are likely to result in carbon emissions and typically require a substantial amount of energy to operate.

# Assessment of policies

## Development Management Policies

IIA Framework Objectives

| Policy | Housing and communities | Economy | Education and skills | Health | Connectivity | Air quality and noise | Resources and land use | Historic environment, culture and townscape | Biodiversity and Green Infrastructure | Water environment | Climate change mitigation | Climate change adaptation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **DM Policies** | | | | | | | | | | | | |
| Land for Industry, Logistics and Services to support London's economic function | + | + | 0 | + | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 |
| Locally Significant Industrial Sites | 0 | + | 0 | + | 0 | 0 | + | 0 | 0 | 0 | 0 | 0 |
| Open Space | + | 0 | 0 | + | + | + | 0 | + | + | + | + | + |
| Urban Greening | + | 0 | 0 | + | 0 | + | + | + | + | + | + | + |
| Biodiversity and Access to Nature | + | 0 | 0 | + | 0 | + | + | + | + | + | + | + |
| Sports and Recreation Facilities | + | 0 | 0 | + | 0 | N/A | 0 | 0 | 0 | N/A | 0 | 0 |

- All of the DM policies, except Locally Significant Industrial Sites (shown on this page) support the 'Housing and Communities' objectives and all of the policies support the 'Health' objectives of the IIA Framework which will likely lead to improvements in these areas across the borough.

# Assessment of policies

## Development Management Policies

IIA Framework Objectives

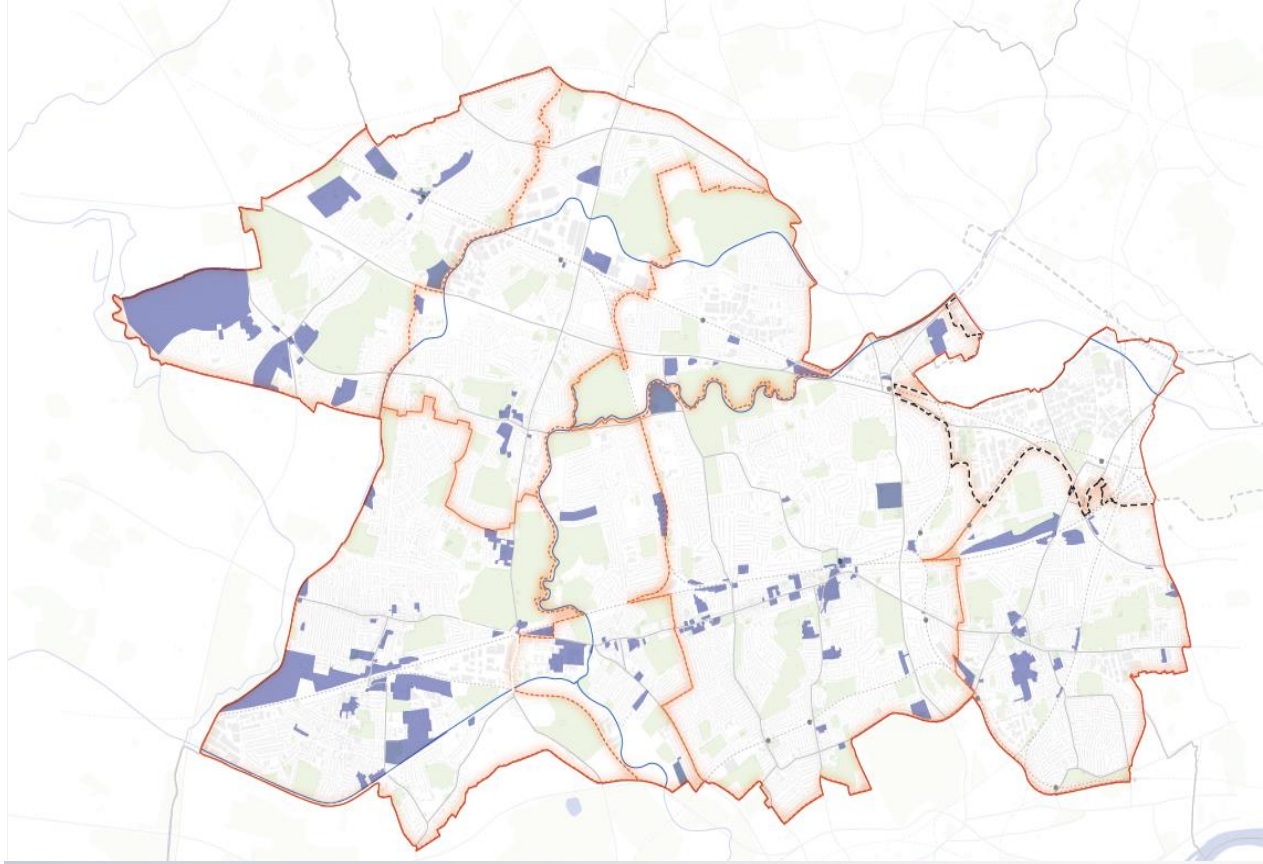
| Policy | Housing and communities | Economy | Education and skills | Health | Connectivity | Air quality and noise | Resources and land use | Historic environment, culture and townscape | Biodiversity and Green Infrastructure | Water environment | Climate change mitigation | Climate change adaptation |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **DM Policies** | | | | | | | | | | | | |
| Operational Energy Performance | 0 | 0 | N/A | N/A | N/A | + | N/A | N/A | N/A | N/A | + | + |
| Embodied Carbon | N/A | N/A | N/A | N/A | N/A | + | N/A | N/A | N/A | N/A | + | + |
| Whole Life Cycle Carbon Approach | N/A | N/A | N/A | N/A | N/A | + | + | N/A | N/A | N/A | + | + |
| Reducing Waste and Supporting the Circular Economy | N/A | N/A | N/A | N/A | N/A | + | + | N/A | N/A | N/A | + | + |
| Funding the Local Plan | + | + | + | + | + | + | + | + | + | + | + | + |
| Enabling Development | ? | ? | ? | ? | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 |

- The ‘Enabling Development’ policy conflicts with the ‘Biodiversity and Green Infrastructure’ framework objective as it could allow the delivery of development which would outweigh any material planning harm, which may result in adverse impacts on designated sites.

# Assessment of sites

## Methodology

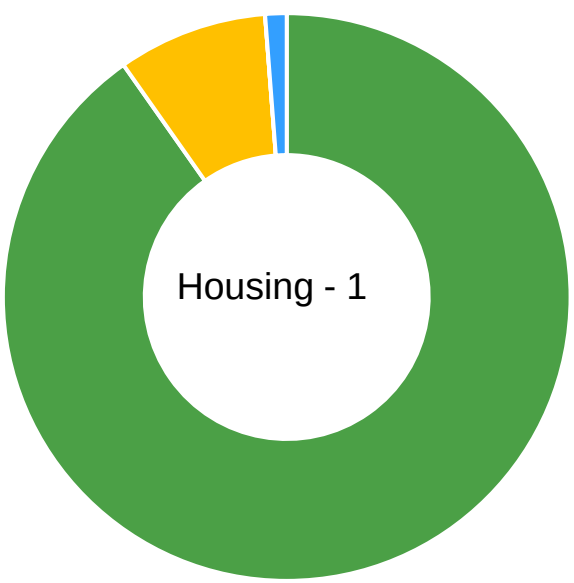
- During the Site Selection process, 82 sites were identified as most appropriate for development.
- These sites were assessed to determine whether or not they have the potential to support the objectives of the IIA framework, excluding climate change mitigation and adaption as relevant criteria is covered in ‘Connectivity’ and ‘Water resources’ respectively.
- The scoring system follows the same principle as that used to assess the policies.
- In the main report, the scoring is supported by a concise narrative providing justification for the evaluation.
- The assessment is based on professional judgement, using the guiding questions set out in the framework, best practise and relevant evidence.
- The results shown on the next five pages show how the 82 sites scored (as a proportion) against each of the 20 criteria.

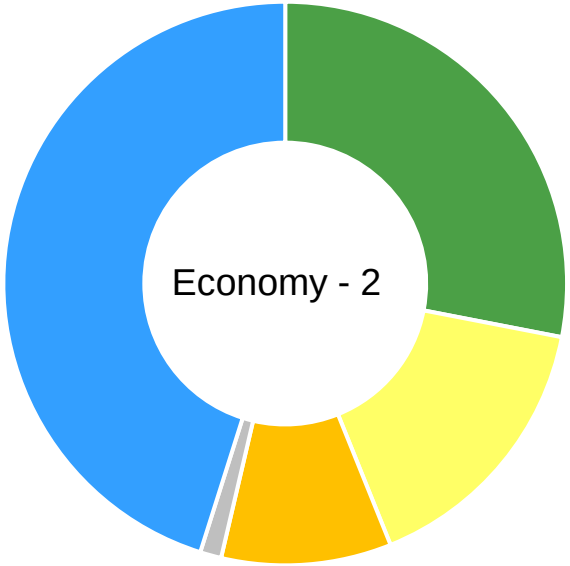


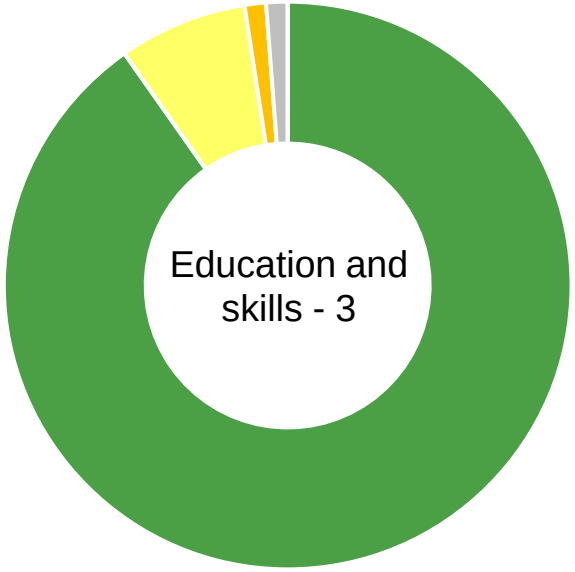
# Assessment of sites

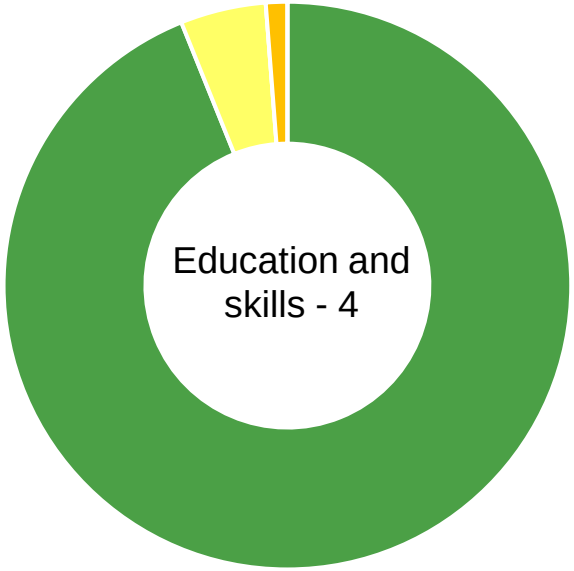
## Summary of Results

As stated on the previous page, the pie charts represent how the total 82 sites scored, as a proportion, against each criteria.
For example, the majority of sites scored positively against the ‘Housing’ criteria where as scoring was more mixed against the ‘Economy’ criteria.



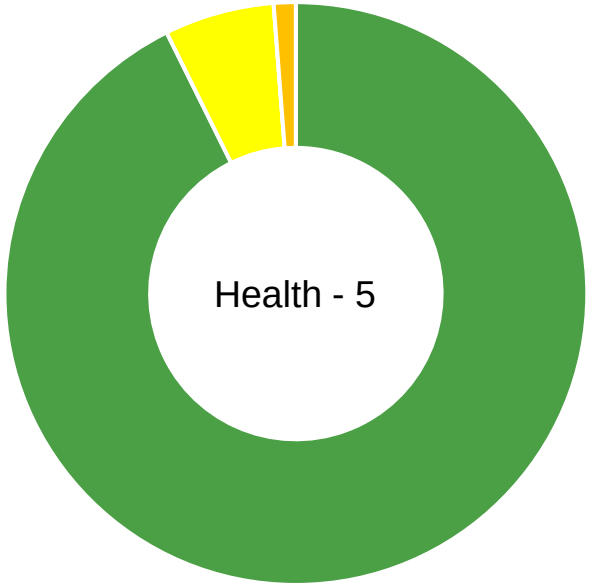



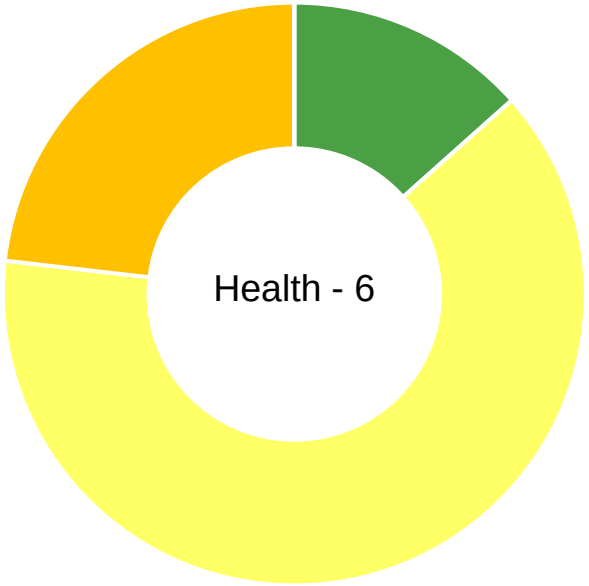



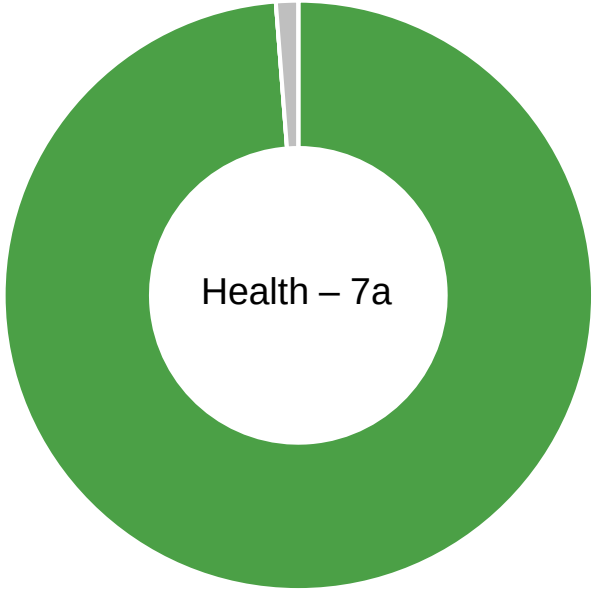



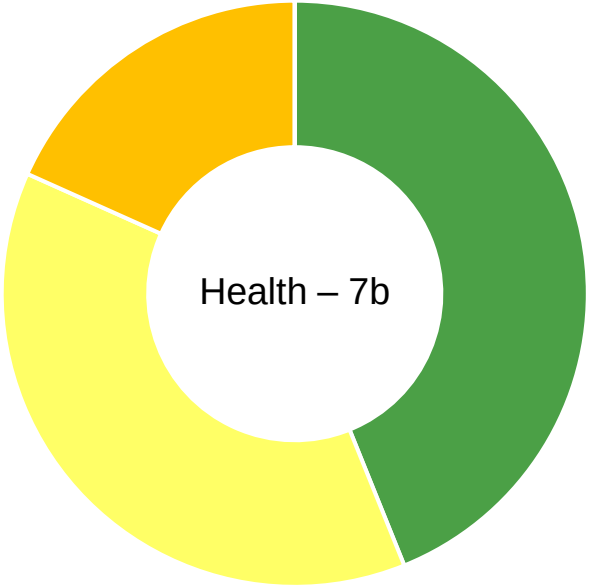
# Assessment of sites

## Summary of Results



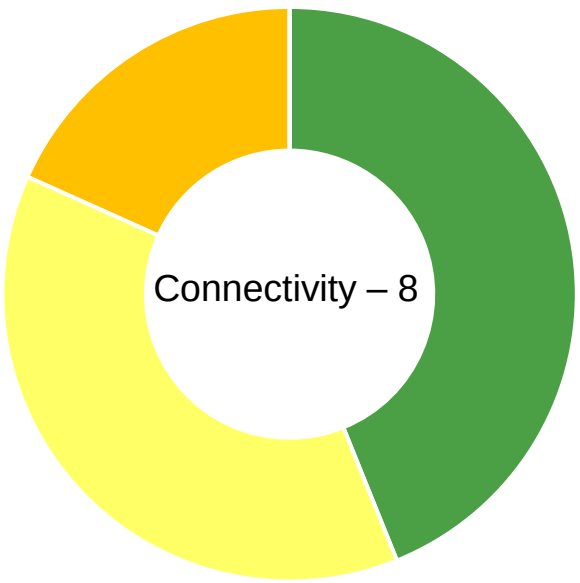



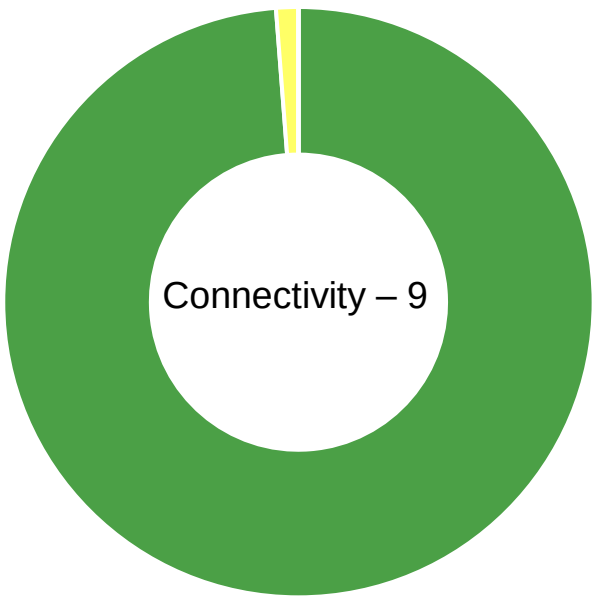



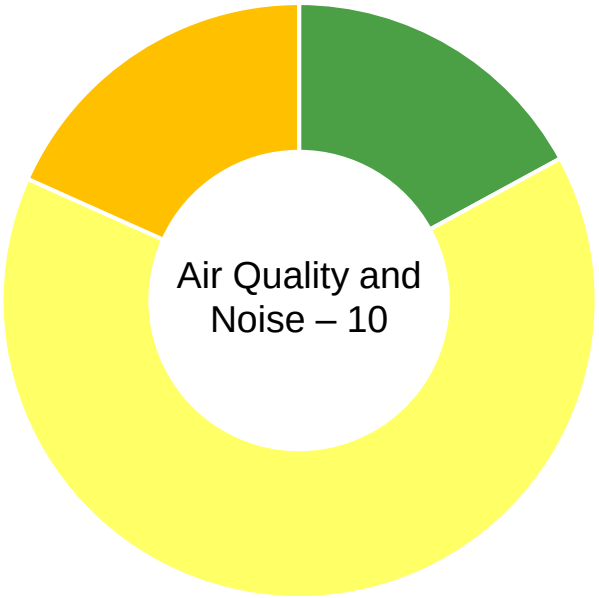



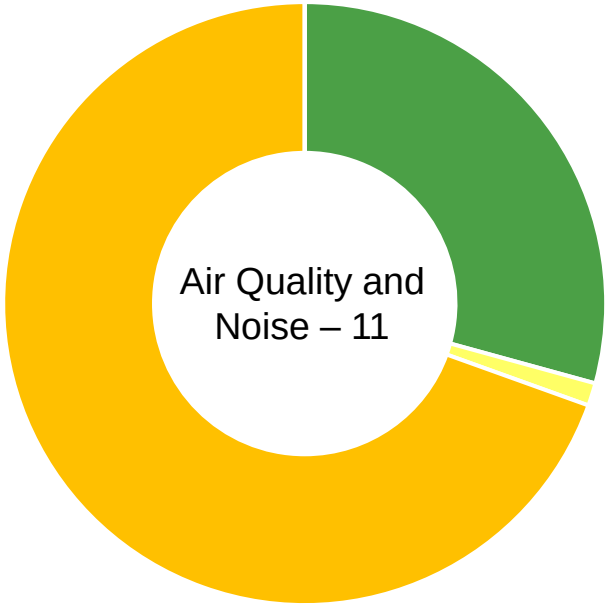
# Assessment of sites

## Summary of Results



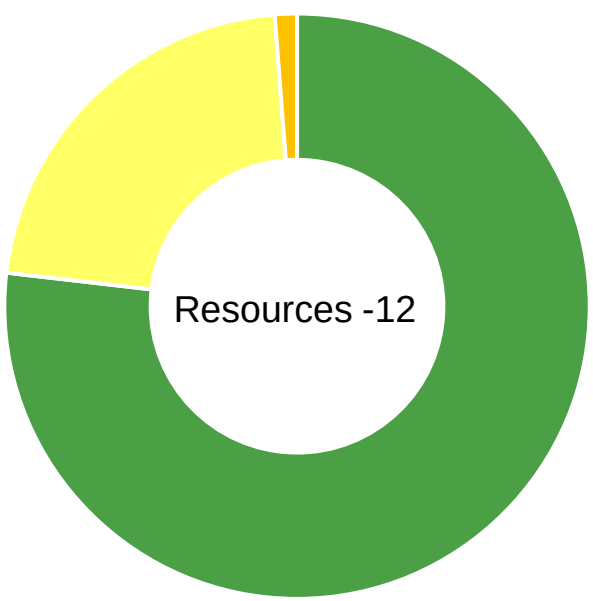



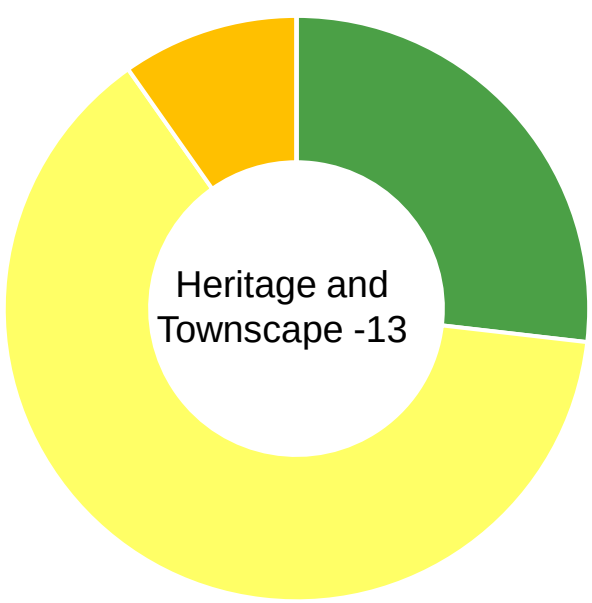



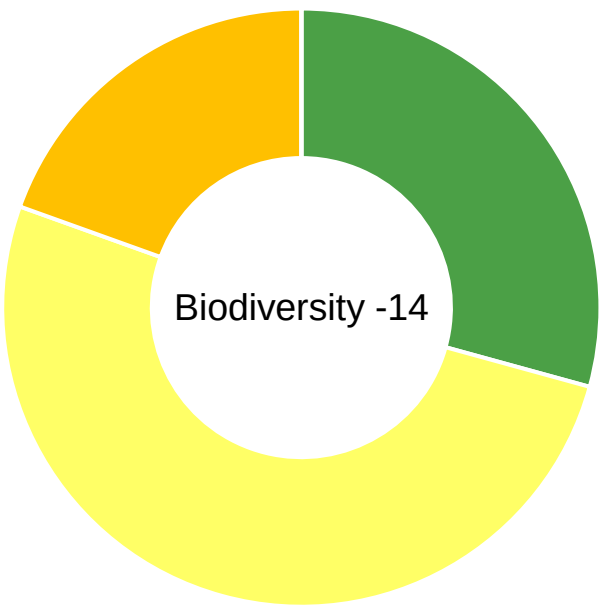



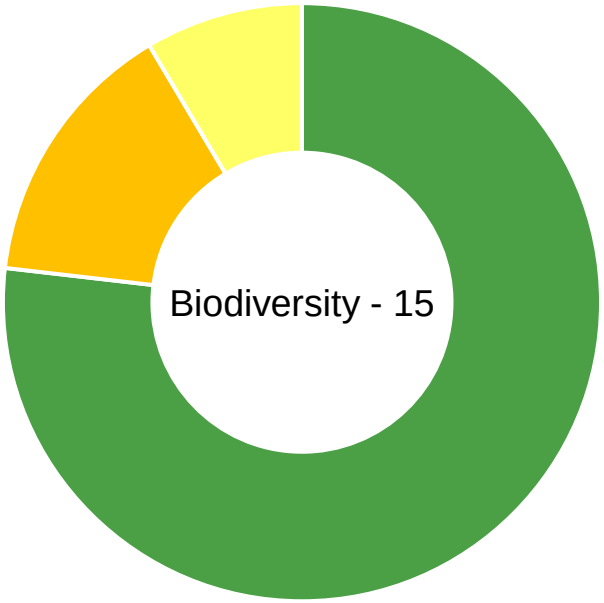
# Assessment of sites

## Summary of Results



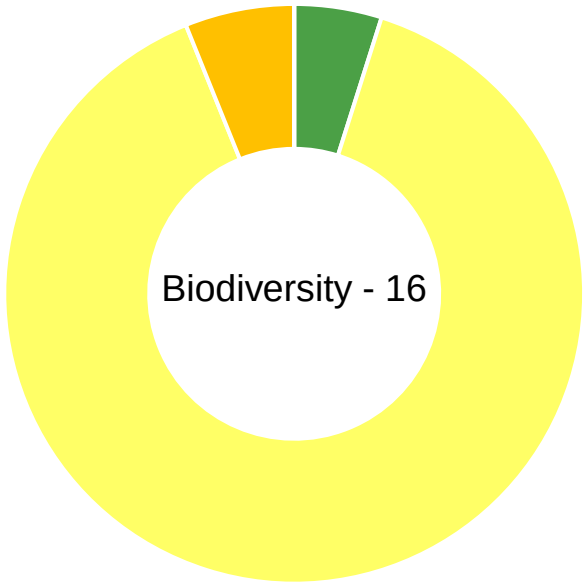



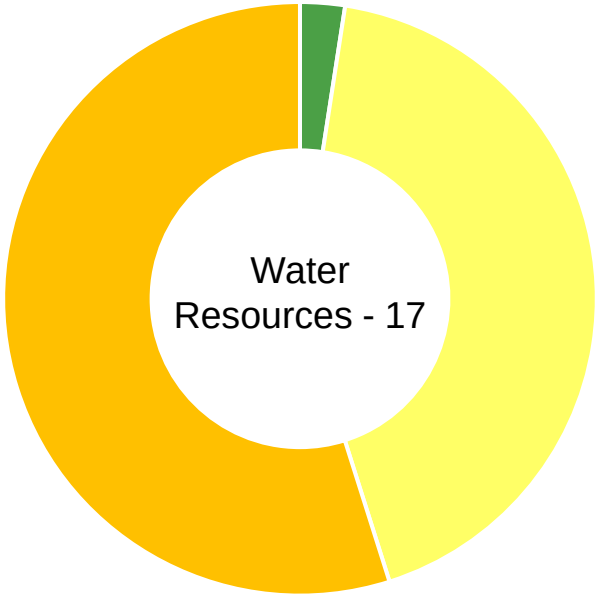



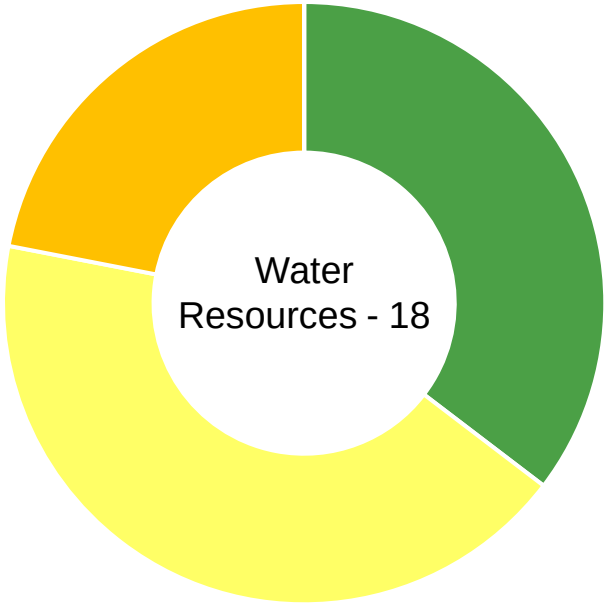



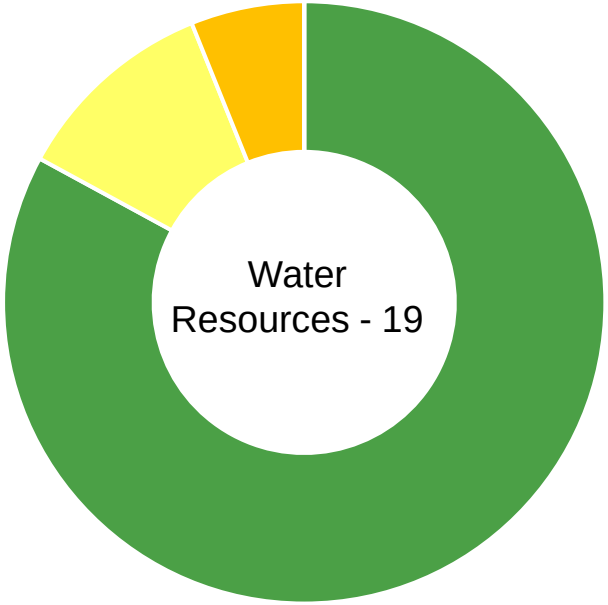
# Assessment of sites

## Summary of Results



# Equality Impact Assessment

EqIA is a means of systematically identifying and assessing the likely effects arising from the design and implementation of a proposed plan or policy for people sharing one or more protected characteristics as identified in the Equality Act 2010*.

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 and as such, this characteristic was scoped out of the assessment.

Socio-economic status is not a characteristic protected by the Equality Act. However, it is considered in an EqIA due to its close association with the protected characteristics.

The next few pages summarise some of the key findings and themes across all the policies (Strategic, Town and Development Management).

## All protected characteristic groups

Promoting green and open spaces would likely bring benefits to all groups but may also unintentionally lead to crime and anti-social behaviour if measures are not taken to create a safe environment.

Other policies that will likely benefit all groups include:

- Taking firm action on climate change;
- The delivery of education and community facilities;
- Improving connectivity across the borough and implementing 20-minute neighbourhoods;
- Residential growth and regeneration.

*Legislation.gov.uk. 2010. Equality Act 2010. [online] Available at: http://www.legislation.gov.uk/ukpga/2010/15/contents

# Equality Impact Assessment

## Age

Improved access to healthcare will likely be beneficial to all ages but particularly the elderly who generally require more frequent health care.

The Local Plan's encouragement of public and active transport may have a negative impact on the elderly.

## Disability

Improved access to healthcare will likely be beneficial to those with disabilities.

Equitable access to jobs would likely benefit those with disabilities.

Reducing the impacts of the aviation industry could benefit those with disabilities, particularly noise and vibration sensory issues.

The Local Plan's encouragement of public and active transport may have a negative impact on those with disabilities.

## Pregnancy and maternity

Improved access to healthcare will likely be beneficial to pregnant people.

## Race

Enhancing the cultural identities of LB Ealing's seven towns would likely benefit minority ethnic groups.

Equitable access to jobs would likely benefit those from ethnic minority groups.

Reintegration of land uses can encourage social cohesion which would likely benefit ethnic minority groups.

# Equality Impact Assessment

## Religion or belief

Enhancing the cultural identities of LB Ealing's seven towns would likely benefit religious groups.

Equitable access to jobs would likely benefit religious groups.

Reintegration of land uses can encourage social cohesion which would likely benefit religious groups.

## Sex

Designing safe and secure environments will likely benefit women.

Supporting the night-time economy may lead to increased risk to women.

## Sexual orientation/Gender reassignment

Designing safe and secure environments will likely benefit people with gender reassignment and those who identify as LGBTQ+.

Supporting the night-time economy may lead to increased risk to people with gender reassignment and those who identify as LGBTQ+.

## Socio-economic status

Reinforcing the town's industrial core and diversifying local centres would create employment opportunities and likely benefit those of a low socio-economic background.

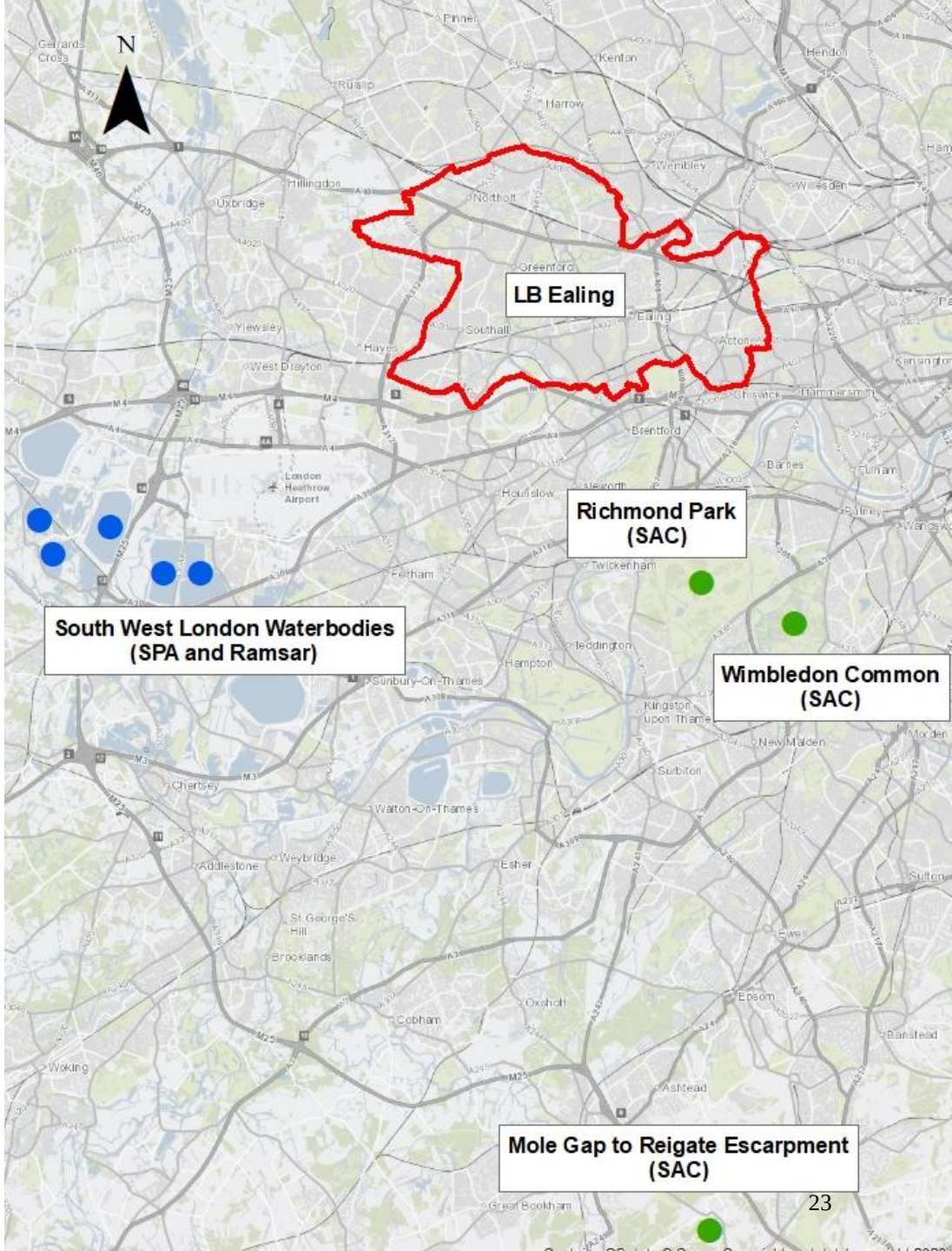
Provision of affordable homes and social rented properties will likely benefit those of a low socio-economic status.

# Habitats Regulation Assessment

## Screening Report summary

- The report aims to provide HRA Screening of the policies of the Local Plan to assess whether the plan, either in isolation or in combination with other plans or projects, would have a significant adverse effect on European Sites (now known as National Site Network (NSN)).
- Based on information gathered there are no NSN sites within the LB Ealing Local Plan Boundary. However, there are four sites outside the boundary that may be affected and therefore have been assessed.
  - Mole Gap to Reigate Escarpment (24.5km south)
  - Richmond Park (4.2km south)
  - South West London Waterbodies (7.5km south-west)
  - Wimbledon Common (5.9km south-east)

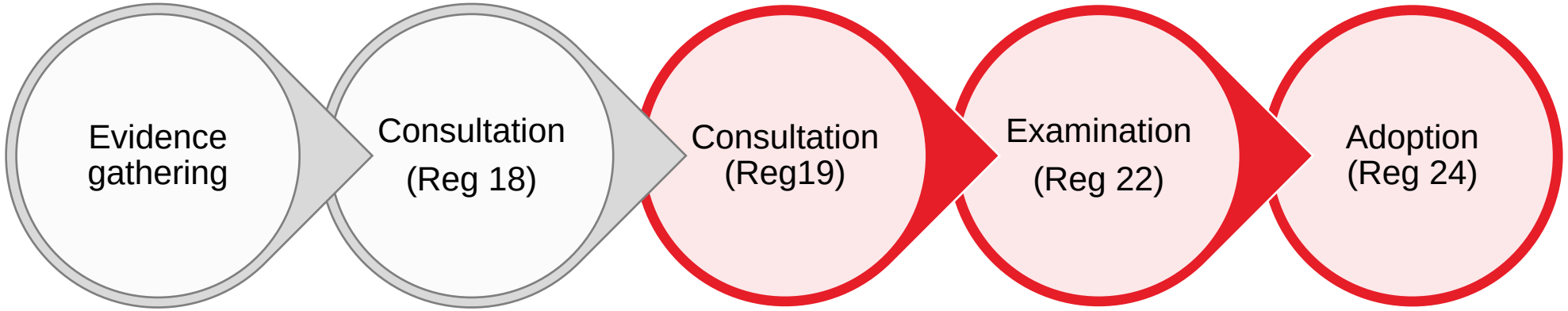
- **Overall, based on relevant guidance detailed in the full HRA report, screening has identified that the policies will have no significant effects on the NSN sites.**



# Next Steps

## Local Plan timeline

- The IIA will undergo Regulation 19 consultation along with the Local Plan.
- Based on consultation responses the IIA may be updated prior to examination.



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