

Sustainability Appraisal Executive Summary Report

Submission Document EAL6a

February 2011

EALING COUNCIL

Introduction

This Report

This document is the Non Technical Executive Summary Version of the Final Sustainability Appraisal Report (incorporating Strategic Environmental Assessment) of the Submission Draft Version of the Ealing 2026 Development Strategy. A Non Technical Executive Summary version is produced in line with the requirements of the Strategic Environmental Assessment Directive. This report also serves to aid accessibility to what is a lengthy technical document. Note that any changes underway at present to the submission draft of the Strategy are non-material and do not impact upon the outputs of this report. This report follows on from the previous Commentary Report covering the SA of the Final Proposals for the Development Strategy published in September 2010. It should also be noted that this report addresses the Development Strategy document only, and separate commentary reports will be published at a later date as the Development Sites and the Development Management documents evolve.

The Development Strategy

The Development Strategy sets out Ealing Council's over arching vision and proposals for the future development of the Borough over the next 15 years until 2026, and provides a spatial policy framework for all other Local Development Document's. The proposals set out how, where and when the Council, working with statutory bodies, the private sector and voluntary sector, will:

- Provide new housing for the Borough's growing population;
- Sustain and create jobs;
- Protect and enhance green and open space and the borough's heritage; and,
- Ensure that community facilities, services and transport infrastructure are provided where and when needed.

When approved it will become a statutory Local Development Document forming part of the Local Development Framework for Ealing. This Suite of Development Plan Documents will ultimately replace Ealing's Unitary Development Plan. The Development Strategy is a key document, which all other Development Plan Documents (DPD's) must conform with. The Strategy is also developed within the regional planning framework set out by the London Plan.

Under the Planning and Compulsory Purchase Act 2004, Local Planning Authorities are required to undertake a Sustainability Appraisal (SA) for all Local Development Documents (LDD's).

Methodology

The preparation of the Sustainability Appraisal of the Submission Development Strategy has involved the following stages:

- The production of a Scoping Report, which sets out the scope of the Sustainability Appraisal for the Local Development Framework
- The production of interim SA reports at each stage in the evolution of the DPD
- The production of this Final Sustainability Appraisal Report

The first stage of the Sustainability Appraisal involved reviewing relevant plans, programmes and strategies, collecting information to develop an understanding of the social, environmental and economic factors in the Borough and beyond. This framework was developed through the Scoping Report.

A range of options were put forward to address the key planning issues facing the Borough over the Plan period. These were appraised against each of the Sustainability Objectives and this showed how the options compared in sustainability terms. This has aided the development and refinement of options. The next stage was to predict and evaluate the effects of the Core Strategy DPD. This is in terms of their magnitude, geographical scale, and time period over which they will occur.

Other factors are also taken into account for example whether the effect is temporary or permanent, positive or negative, frequency or secondary effects. Mitigation measures are also proposed to prevent, reduce or offset significant effects or to maximise beneficial impacts.

However, whilst the process scrutinises comprehensively, many issues are largely dependent upon implementation, and upon the policies which emerge from the Development Management and Development Sites DPD's. It must be acknowledged that the SA process is not a perfect, and that other factors will influence development that may not be within the scope and horizon of this report.

Baseline information and current state of the environment

In the Scoping Report, a Sustainability Appraisal Framework was developed and this framework has been used to appraise the sustainability of the Development Strategy. As part of the framework, nineteen sustainability objectives were identified, covering a range of aspects from environmental, economic and social issues, key to the future of the Borough.

The framework was decided in consultation with key stakeholders as follows. It has also been refined over time to increase the effectiveness and scope of the appraisal process.

Refined Sustainability Appraisal Objectives

Refined SA Objectives		
No.	Objective	Type of Objective
1	Actively support inclusive access to essential health, community and local services	Social
2	Promote community involvement, voluntary and partnership working	Social
3	Preserve and enhance the local historic environment and cultural heritage	Environmental/Social
4	Reduce crime, fear of crime and antisocial behaviour	Social
5	Minimise detrimental noise impacts	Environmental
6	Improve access to well designed, affordable, inclusive and appropriately located housing	Social
7	Reduce health inequalities and promote healthy living	Social
8	Protect and enhance the network of open space	Environmental
9	Protect and enhance the natural environment and biodiversity	Environmental
10	Improve air quality	Environmental
11	Reduce contributions to and vulnerability to climate change	Environmental
12	Improve water quality, conserve water resources, and minimise the impact of flooding	Environmental
13	Enhance existing buildings and facilities, and encourage the reuse / remediation of vacant land and under-utilised buildings	Environmental

14	Reduce waste generation and increase waste recycling	Environmental
15	Reduce vehicular dependency and promote the use of sustainable modes of transport	Environmental
16	Promote local employment opportunities, training and skills attainment	Economic
17	Support sustainable economic growth	Economic
18	Improve opportunities for education and training	Social/Economic
19	Promote cultural and community identity	Social

Alternatives

As part of developing the Strategy, a number of possible options for meeting the issues were developed. These were appraised against the sustainability appraisal framework to help identify the most sustainable option. The main body of the report provides a summary of the comparison of the options, with a full record provided as Appendix 1 to the Report.

Significant effects on the environment

In summary, the majority of the policies within the Strategy were considered to have a positive impact in relation to sustainability.

Revision and refinement of policies has been conducted in line with previous SA recommendations, external representations and development of the evidence base. Where possible, as many of the Workshop findings were incorporated into the Strategy prior to the consultation. However, the SA identified some uncertainties and one potential negative effect:

Strengths

- Policies in the Strategy are providing a sensitive balance across social, environmental and economic objectives.

Uncertainties

- The Strategy cannot address all of the Council's SA Objectives through every policy. Where spatial policies cannot address an issue, the appraisal process has highlighted where potential conflicts might be addressed. Two cases in point are noise and air pollution. The refined draft of the Strategy now includes measures to manage noise and air pollution on a spatial scale. In addition to this policy intervention, the Development Management DPD will also manage such issues on a planning application level, on a case-by-case basis. It should also be noted that the production of a variety of Supplementary Planning Documents, as outlined in the Local Development Scheme, shall be produced at various times across the plan period, which will add further definition where some uncertainties still lie.

Negative effects

- Now that the Strategy has been through several stages of refinement, negative effects of policies have been largely minimised or mitigated against as far as is possible. However the appraisal has highlighted that Policy 1.2 (I) could be enhanced in order to satisfy the Council's SA Objectives. As provision for Gypsies and Travellers is a London wide and national issue it would be beneficial if national and regional government provided a clearer direction. In the meantime, monitoring of provision and demand should be conducted in order to ensure that negative effects can be identified should they arise.

As well as the effects listed above, it is acknowledged that many sustainability issues result from the accumulation of multiple small and often indirect effects. Whilst often these effects might be positive, there is also of course the potential for cumulative effects to be negative. It is important therefore that these cumulative and synergistic effects are also appraised. The appraisal process has indicated that most of the predicted effects are generally either positive or neutral.

To provide specificity to the environmental impacts, particularly European protected sites and species, a HRA screening assessment was conducted. In addition, there may be scope to consider cumulative / synergistic effects during the monitoring stage, at which time the appraisal of other key LDF documents will also have been undertaken. The monitoring of the Core Strategies Objectives and the SA indicators can be conducted through the Councils Annual Monitoring Report. Over time, patterns or cumulative effects may emerge, that the SA process may not have identified at this stage in the evolution of the Local Development Framework.

Mitigation measures

The SEA Directive requires information to be provided on '*the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme*'. Mitigation measures also include proactive avoidance of adverse effects and measures to enhance positive effects.

Mitigation measures can take a wide range of forms:

- Changes to options, including bringing forward new options
- Adding or deleting options
- Refining options in order to improve the likelihood of beneficial effects and to minimise adverse impacts
- Technical measures to be applied during the implementation stage

Mitigation measures referred to at previous stages have been taken into account, as far as possible in preparing the submission Development Strategy. These include:

- The formation of ‘hybrid’ policies, combining elements of what were discrete, separate options. These can in several instances, be traced back to the outputs of the Sustainability Appraisal reporting process.
- A spatial expression of noise and pollution issues, to be utilised in combination with the Development Management DPD’s policies
- Increased emphasis on creating places that maintain and improve Quality of Life
- Incorporation of greater aspirations for the retention, improvement and creation of green spaces in new developments
- Reference to designing out crime and creating safer communities
- Embedding the principles and aspirations of the Councils SA Objectives within policy wording
- Pointing to the appropriate document where issues identified might be dealt with (e.g. other DPD or a forthcoming SPD)
- Increasing policy robustness and links with the supporting evidence base.

The positive effects of the DPD could be maximized, and the negative effects reduced, with the addition of further mitigation measures. These are outlined by policy in the table below:

Table 7: Issues / Mitigation and areas to be monitored

Proposal	Issues / Mitigation and areas to be monitored
1.1	There is opportunity to make reference to the reclaiming of Brownfield sites, particularly with regard to the A40 Corridor.
1.2	Consider revising the policy regarding Gypsies and Travellers in light of the commentary provided by this SA and during the Panel Workshop Session. (Lack of evidence base for decision making and minimal reference to consultation/engagement).
2.1	Continue to consider ways in which the environment and economic growth can have a synergistic relationship. With reference to Crossrail and High Speed Rail, the DPD, along with other LDF documents, might need to be revised should any of the plans change which could offer new opportunities for the Borough. A case in point may be the High Speed 2 Scheme, where a report

	to the Secretary of State for Transport by Rt Hon the Lord Mawhinney Kt, advocated focussing a rail hub at Old Oak Common Station, which would interchange with Crossrail. Such a development close to the Borough might suggest the opportunity for increased office or commercial uses in this area.
2.2	No change.
2.3	There is potential to elaborate on policy detail in order to incorporate workshop findings.
2.4	No change.
2.5	Build further references to film and media cultural heritage of this area, and how it could be promoted.
2.6	Provide greater detail within the policy where this is feasible. Otherwise, ensure that adequate master planning incorporates the full breadth of the Councils Sustainability Objectives and fulfils the holistic regeneration potential of the site.
2.7	Minor change: Re-word policy (e) to correct typing error.
2.8	No change.
2.9	No change.
3.1	No change; the policy attempts to mitigate potential issues. Where these issues cannot be addressed at the spatial scale of policy making, the emerging Development Management Document shall be utilised, to ensure that future planning applications are dealt with appropriately, on a case-by-case basis.
3.2	No change in terms of elaborated reference to the canal, as this is addressed through policies in Chapter 5.

3.3	<p>No change with regard to travel plan. These will be dealt with through separate regimes and strategies.</p> <p>The policy could specify what green industry might constitute and how the Council could actually facilitate this growth. E.g. as part of the 'Ealing in London' campaign. There is the Opportunity to make this locally distinctive and to expand upon the generic context set out in the London Plan.</p>
3.4	No change. The policy already recognises the need for a quality environment and proposes significant open space improvements.
3.5	Where this is possible, consider adding greater certainty to the policy, to ensure the SA Objectives will be met.
3.6	No change, the policy already incorporates the concerns raised in the workshop.
3.7	There is no reference to mixed-use development in centres, part of the 'Urban Renaissance' and 'Sustainable Communities' Agenda. This could be brought within the policy.
3.8	In order to ensure SA Objectives are met, further detail could be added to the policy. Further clarity could be provided regarding the regeneration of municipal housing estates. Policy could detail interaction with the Green Corridor
4.1	Further reference could be made specifically to the environment.
4.2	There is still the potential to expand upon the detail within this policy, in order to satisfy the broadest range of SA Objectives.
4.3	There is still the potential to expand upon the detail within this policy, in order to satisfy the broadest range of SA Objectives and incorporate fully the workshop findings.
4.4	No change.

5.1	Funding will be an important issue in developing and maintaining positive uses of Green Belt. Alternative funding streams and revenues should be explored in the future to ensure that if traditional funding is threatened, that the quality of leisure, recreation and other uses is not jeopardised.
5.2	Within the Strategy, or elsewhere within the Local Development Framework, options for alternative funding streams should be explored for the maintenance, enhancement and creation of open land. In the current economic context, with increased budgetary pressures, it must be ensured that the vitality and viability of open space networks are not compromised by loss of traditional funding streams.
5.3	In order to compound the positive elements within this policy, a refined wording could include reference to habitats and biodiversity.
5.4	As more information becomes available, the policy could provide greater spatial detail and incorporate further the findings of the Open Space Strategy.
5.5	The workshop findings could still be brought forward more clearly, with the economic benefits of green space emphasised within policy. The links to positive health, quality of life and tranquillity could also be drawn.
5.6	No change.
5.7	Provide spatial detail.
6.1	In order to meet the established Sustainability Objectives, the Borough could build greater aspirations around the development of renewable energy infrastructure. As a London Borough there are perhaps more significant opportunities than in any other part of the Country. Reference could be made to tackling reliance on fossil fuel and nuclear energy, as has been done in a number of European Cities such as Freiburg in Germany, which has been developed as a pioneer in the use of renewable energy. Make specific reference to sustainable transport infrastructure as a strategic priority over the private car.

6.2	As a spatial document, this policy could provide greater detail regarding the distribution and spread of social infrastructure (i.e. locating at the most sustainable locations; this is likely to be existing local centres for a large majority of services (where this is appropriate and feasible). Reference could be made to the Development Sites DPD, which will indicate where some of these uses might locate. It would also be expected that the policy would make reference to the partners and stakeholders that the Council would be working with to deliver the policy. The policy should also make reference to the funding streams that might deliver these elements.
6.3	Biodiversity, habitat networks and landscape character are at the heart of Green Infrastructure; these should be recognised explicitly within the policy. Positive impacts on health should also be recognised within the policy.
6.4	N/A

Monitoring

The SEA directive requires that the Environment Report (in this case the SA report) include details of the proposed monitoring process. It is essential that the performance of the DPD is regularly monitored to ensure that it is meeting its objectives and that any negative impacts are minimised/eliminated. This monitoring will also be key to ensuring that the DPD remains current and relevant. Revisions to the DPD may also be necessary in light of changes in legislation. In terms of the monitoring itself, many of the indicators identified for the baseline data will be particularly useful. These indicators will allow us to check if the SA predictions of sustainability effects outlined in this report were accurate, and to see if the DPD is contributing to the achievement of the SA objectives. This monitoring exercise will also allow us to identify if the recommended mitigation / enhancement measures are having the correct effect. In order for this to be possible however it will be dependent on ensuring that the baseline data is up to date and regularly reviewed.

Where unforeseen adverse effects are identified as part of this monitoring process, consideration will be given to the need to review the DPD to mitigate against these concerns. It is envisaged that this SA monitoring will form part of the overall annual LDF

monitoring exercise. The Annual Monitoring Report (AMR) is scheduled to be published in December of each year. It should be noted that some of the baseline data collected for the SA appraisals had previously been collected for the AMR.

As part of the AMR process it would be useful to develop sustainability performance indicators or sustainability best value indicators. Monitoring will also consider the cumulative/synergistic effects of the DPD in light of other LDF documents, some of which at present have only been subject to the early stages of the SA process. Further details on the monitoring process will be outlined in subsequent publications.

Future Work / Next Steps

The next stage in the SA process will be task D2 (Appraisal of significant changes).

For further copies of this document or any of Ealing's local development framework documents, please contact:

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