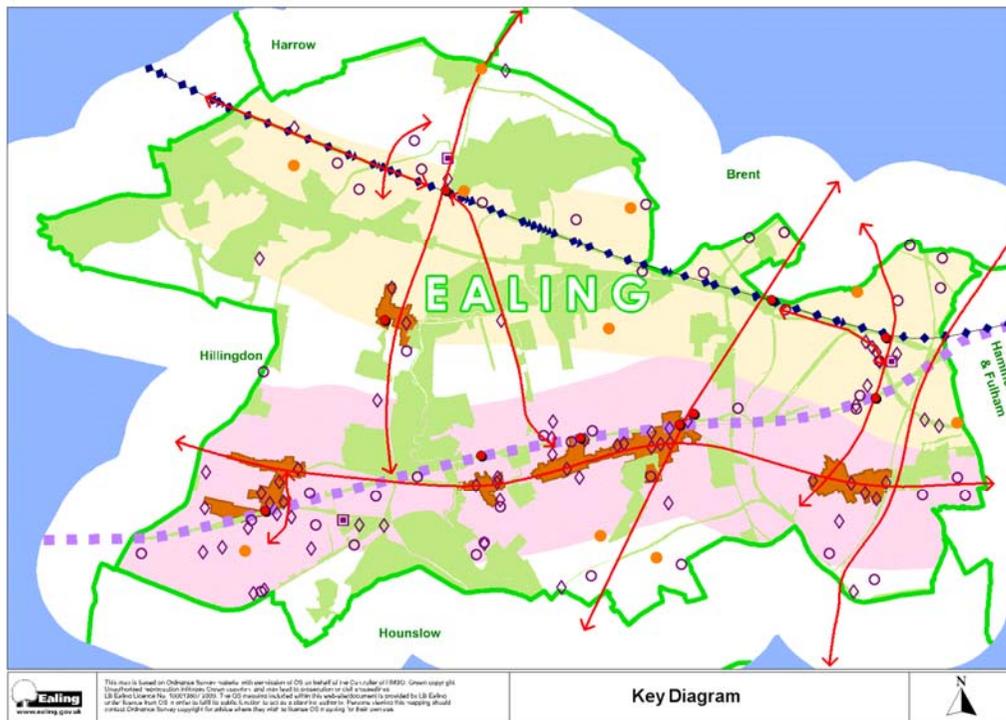# 2026

Development Management Initial Proposals

Sustainability Appraisal Incorporating Strategic Environmental Assessment

Full Technical Report (July 2011)

Key Diagram

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1. Introduction

This Report is the Sustainability Appraisal of the Development Management Initial Proposals. The Development Management document will be the key tool in guiding decisions on planning applications in Ealing. The Document will compliment the Development Strategy, which sets out the overarching vision, and the Development Sites Document, which details the portfolio of locations for development across the plan period. Ultimately, this document will supersede the development management policies in Ealing's Unitary Development Plan.

When approved it will become a statutory Local Development Document forming part of the Local Development Framework for Ealing. Under the Planning and Compulsory Purchase Act 2004 (PCPA), Local Planning Authorities are required to undertake a SA for all Local Development Documents (LDDs).

2. The Sustainability Appraisal Process

In accordance with Section 5 of the Planning and Compulsory Purchase Act 2004 and EU Directive 2001/42/DC, a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are required for Development Plan Documents (DPDs), produced as part of the Local Development Framework. Whilst the requirement to undertake a Sustainability Appraisal and Strategic Environmental Assessment (SEA) are separate and distinct, it is possible to satisfy both through a single appraisal process, in this case a Sustainability Appraisal.

The primary purpose of the Sustainability Appraisal (SA) is to promote sustainable development through the better integration of social, economic and environmental considerations into the preparation of plans. Sustainable development can be defined as "ensuring a better quality of life for everyone, now and in future generations". 'Securing the future – New UK Sustainable Development Strategy (2005)' sets out the following 4 key objectives, under the broad heading of sustainable development:

- Social progress which recognises the needs of everyone
- Effective protection of the environment

- Prudent use of natural resources; and
- Maintenance of high and stable levels of economic growth and employment.

The SA is an iterative process allowing us to identify and report on the likely significant effects of the plan, and to illustrate the benefits and risks of different policy options, to enable a transparent decision making process. The SA process needs to be fully integrated into the planning system to ensure that conclusions from the appraisal inform planning decisions

3. The Scope of this Report

In January 2006, the Council published a Sustainability Appraisal Scoping Report for use alongside the preparation of Development Plan Documents (DPD's). The Scoping Report includes baseline information about Ealing and identifies key environmental and sustainability issues for the Borough. To provide a sound basis for analysis, the report also identified relevant plans and programmes along with key sustainability issues and problems. From these issues, objectives and indicators have been produced. The objectives form part of the appraisal framework against which LDF documents will be assessed. The report is generic and therefore suitable to aid the appraisal of most LDF documents. The Scoping Report, and in particular the SA Framework, was refined following consultation with statutory consultees. The updated SA Framework is set out in Appendix 3.

This report utilises the established framework, providing a sustainability commentary on the Development Management Initial Proposals Development Plan Document, published for consultation in September 2010. It effectively represents an interim/progress report prior to completion of the full SA report at Submission stage (July 2012). It should also be noted that this report addresses the Development Management document only, and separate commentary reports will be published as the Development Sites and Development Strategy documents evolve. Note that a number of options previously identified as part of the Development Strategy are now to be taken forward in the emerging Development Management DPD, and form part of this appraisal process.

4. Appraisal Timeline

The key stages in the SA of the Development Management DPD are set out in table 2 below. This timetable follows government guidance as set out in 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (ODPM, 2006). It should be noted that this has been modified slightly to reflect the new stages introduced through changes to Planning Policy Statement 12 'Local Development Frameworks' and the Regulations.

Table 1 – key SA stages

Jan – Feb 09	Stage A	Pre-production - Scoping
March 09	Stage A1	Review other policies, plans and programmes, and sustainable development objectives
March 09	Stage A2	Collecting Baseline information
March 09	Stage A3	Identifying sustainability issues and problems
March 09	Stage A4	Developing the SA framework
March 09	Stage A5	Consulting on the scope of the SA.
	Stage B	Production - Options
June 10	Stage B1	Testing the DPD objectives against the SA Framework
July 09	Stage B2	Developing the DPD options
July 10	Stage B3	Predicting the effects of the DPD based on Issues and Options
July 10	Stage B4	Evaluating the effects of the DPD based on Issues and Options
July 10	Stage B5	Considering ways of mitigating adverse effects and maximising beneficial effects
July 10		Produce commentary of appraisal findings of the Issues and Options for internal consideration & informal consultation with stakeholders

July 10	Stage B6	Proposing measures to monitor the significant effects of implementing the DPD.
August 10		Developing the Initial Proposals, with consideration of findings from SA of Issues and Options
January 11	Stage B3 Part 2 – Initial Proposals	Predicting the effects of the DPD based on the Initial Proposals
January 11	Stage B4 Part 2 – Initial Proposals	Evaluating the effects of the DPD based on the Initial Proposals
January 11	Stage B5 Part 2 – Initial Proposals	Considering ways of mitigating adverse effects and maximising beneficial effects
		Analysis of SA findings and recommendations
February 2012	Stage B3 – Part 3 – draft subm	Predicting the effects of the DPD based on the Final Proposals document
February 2012	Stage B3 – Part 3 – draft subm	Evaluating the effects of the DPD based on the Final Proposals document
February 2012	Stage B3 – Part 3 – draft subm	Considering the ways of mitigating adverse effects and maximising beneficial effects
	Stage C	Preparing the Sustainability Appraisal Report

March 12	Stage C1	Preparing the SA Report
	Stage D	Consulting on the Submission document and SA Report
March 12	Stage D1	Public participation on the Final Proposals and the SA Report
February 2013	Stage D2(ii)	Appraising significant changes resulting from representations (following Examination and receipt of Inspectors report)
February 2013	Stage D3	Making decisions and providing information
May 2013		Prepare Sustainability Statement as part of Adoption Statement
	Stage E	Monitoring implementation of the plan
	Stage E1	Finalising aims and methods for monitoring
	Stage E2	Responding to adverse effects

5. Compliance with the SEA Directive/Regulations

Strategic Environmental Assessment is derived from European Directive 2001/42/EC and concentrates on the environmental aspects of a plan. As noted above, Sustainability Appraisal is a requirement of Section 39(2) of the Planning and Compulsory Purchase Act 2004 and encompasses social and economic considerations, as well as the environmental factors considered by Strategic Environmental Assessment.

Whilst the requirement to undertake a Sustainability Appraisal and Strategic Environmental Assessment (SEA) are separate and distinct, there is a considerable degree of overlap and it is possible to satisfy both through a single appraisal process, in this case a Sustainability Appraisal.

Table 2 'Strategic Environmental Assessment Directive Requirements' indicates where the particular requirements of Strategic Environmental Assessments are addressed within the body of this report and in future SA documents.

Table 2 – SEA Directive Requirements

SEA Directive Requirements	Where the requirements have been addressed
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	To be met at a later stage – as part of the SA report to be published alongside the Submission Document
a) An outline of the contents, main objectives of the plan or	Section 'Introduction to the DPD's' above

programme, and relationship with other relevant plans and programmes;	
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 'Task A2: Review of Baseline Data'
c) The environmental characteristics of areas likely to be significantly affected;	Section 'Task A2: Review of Baseline Data'
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Sections 'Task A1 & A2 and Appendices 1 & 2
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the ways those objectives and any environmental considerations have been taken into account during its preparation;	Section 'Task A1' & 'Appendix 1'
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects could include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Assessed through Commentary Reports accompanying each iteration of the Strategy. The Final SA Report will be published following consultation on the Draft Submission Document.
g) The measures envisaged to prevent, reduce and as fully as	Assessed through Commentary Reports accompanying

possible offset any significant adverse effects on the environment of implementing the plan or programme;	each iteration of the Strategy. The Final SA Report will be published following consultation on the Draft Submission Document.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Presented through previous SA Reports, and to be collated as part of the SA Report to be published alongside Submission DPD.
i) A description of the measures envisaged concerning monitoring in accordance with Article 10;	See section 'Monitoring'
j) A non-technical summary of the information provided under the above headings.	Executive Summary
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	
Consultation: 1. Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental (Art. 5.4). 2. Authorities with environmental responsibility and the public shall be given an early and effective opportunity	1. SA Scoping Report, March 2009 2. Iterative SA Reporting Programme published for public consultation and sent to Statutory consultees, (including this report) 3. N/A

within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). 3. Other EU Member states, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	
Taking the environmental report and the results of the consultations into account in decision making (Art. 8)	Addressed in each iteration of the Development Plan Document
Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art. 7 shall be informed and the following made available to those so informed: - The plan or programme as adopted; - A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the options expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with; and - The measures decided concerning monitoring (Art. 9 and 10).	To be addressed at a later stage
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be addressed at a later stage

6. Habitat Directive Assessment

As part of the SA process, a screening assessment must be undertaken to determine whether or not there is a need to undertake a Habitat Directive Assessment (HDA), also known as an Appropriate Assessment (AA). This is in accordance with Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ('Habitat Directive'). The EU Habitat Directive and Birds Directive are implemented in the UK through the Conservation (Natural Habitats) Regulations 1994 (as amended).

The Screening Assessment identifies whether the plan or project is likely to have a significant effect on European designated conservation sites, either alone or cumulatively. Such designated sites include Special Protection Areas (SPAs), Special Areas for Conservation (SAC's) and Ramsar sites (wetlands of international importance designated under the Ramsar convention). If it is unlikely that the plan or project will have a significant effect upon these sites, then there is no need to proceed to an AA.

If however it is considered likely that there will be significant effects on the designated sites, an AA must be undertaken. The AA will then determine whether or not the plan or project (either alone or cumulatively) will lead to an adverse impact on the site's integrity. Mitigation and alternative measures may be adopted if it is determined that the plan or project is likely to significantly impact upon the site.

There are no European sites that fall within the Ealing Borough boundary. However, recognising that the plans being prepared by the Council, may influence European sites in neighbouring boroughs, sites have been scoped into the study if they occur either wholly or partly within 10km of the borough boundary. In this regard the following sites have been considered:

- Ramsar site / Special Protection Area: South West London Waterbodies.
- Special Conservation Areas: Richmond Park & Wimbledon Common.

The Scoping Report for the Development Strategy Final Proposals found that there would be no significant impacts as a result of the Development Strategy. The full report was published for consultation in September 2010. An annex to the report will be published to screen the final proposals of the Development Management DPD in 2011.

7. Consultation

As required by the Strategic Environmental Assessment (SEA) Directive (Article 6(2)), the SA Scoping Report was referred to the four Consultation Bodies with environmental responsibilities namely, the Countryside Agency and English Nature (now both part of Natural England), English Heritage, and the Environment Agency, in January 2006.

Comments were received in response to this consultation. These responses resulted in a number of changes to the SA framework for the Development Plan Documents. This input has been particularly useful in updating the baseline data and in refining the SA objectives. Natural England, English Heritage and the Environment Agency will be consulted on all forthcoming stages of the SA process.

This report accompanies the Development Management, Issues and Options document. Ealing Council welcomes your views on any aspects of this report. In particular the following questions are asked:

- Are there any significant effects that were not identified?
- Has the sustainability appraisal process been carried out in a clear and understandable way?

Following public consultation, responses will be reflected through later versions of the Development Management Document.

8. The Sustainability Appraisal Framework

The establishment of SA Objectives and criteria is central to the SA process. The SA Framework, based on these Objectives, provides a way in which sustainability effects can be described, analysed and compared.

The SA Scoping Report for the Development Plan Documents, issued for consultation in January 2006, identified environmental, social and economic objectives contained in other relevant plans, policies and programmes, and baseline information on environmental, social and economic characteristics of the Borough. The review of plans and programmes of relevance to the

Development Plan Documents and the collection of baseline information helps to identify the issues which the DPD's need to address and enabled a robust appraisal of their significant effects. The Scoping Report also identified key sustainability issues affecting the borough and sets out the framework for the SA including objectives, criteria and indicators.

In particular, comments were received from statutory consultees, who identified new plans, policies and programmes and further sources of baseline data. Further updates were also made following the subsequent publication of the SA report for various Supplementary Planning Documents & the Scoping Report for the Development Management DPD, which broadly adopted the same SA Objectives.

The SA Objectives set out in Table 3 below were developed in response to the key sustainability issues identified through the scoping process, and were subsequently refined following consultation on the Strategy and Sites SA Scoping Report in January 2006. In particular, the SA Objective relating to open space and nature conservation was split into two separate objectives, as it was felt that these topics were distinct and broad enough to require consideration in their own right. In respect of SA Objective 11, a new reference was also added regarding the need to minimise flood risk. It was also requested that this objective be separated into two issues – 'water quality' and 'water resources'. Whilst it was acknowledged that 'water quality', 'water conservation' and 'flood risk' are distinct issues, they each fall under the common heading of the water environment. For this reason these issues have been consolidated under a single objective. It was also considered appropriate to limit the objectives to a manageable number, in order to aid an already complex appraisal process and accord with Government guidance. Since the publication of the Scoping Report in January 2006 further updates to the baseline data and a review of the plans, policies and programmes were completed.

Table 3 – 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 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

9. Local Development Framework Objective Appraisals

To ensure the LDF objectives, which structure the content of the Development Management DPD, are in accordance with sustainability principles, the LDF objectives are tested against the SA objectives by way of compatibility matrices set out in table 4 below. Where compatibility issues or contradictions have been identified, consideration has been given to the need to refine the LDF objectives to minimise such conflicts.

The results in table 4 highlight that the compatibility test did identify some potential areas of conflict with the SA objectives. In particular, likely conflicts were identified between many of the environmental objectives (relating to air quality, open space, biodiversity, detrimental noise impacts, climate change and water resources, flooding, waste and sustainable transport) and LDF objectives 4 and 9 ('Ensuring sufficient, high quality accommodation for all Ealing's residents' and 'Achieving and sustaining prosperity for communities and businesses across Ealing' respectively). The appraisal also identified a potential incompatibility between LDF Objective 9 and SA Objective 3 (Preserve and enhance the local historic environment and cultural heritage). Notwithstanding these areas of conflict, it was not considered necessary to refine the LDF objectives further at this stage. Where potential conflicts arose, consideration was given to ways in which these potential sources of conflict could be avoided or mitigated through the drafting of the Development Plan Documents.

The objectives of the Development Management Document have been tested against the sustainability objectives by means of a compatibility matrix to identify both potential synergies and inconsistencies. The matrix (Table 4) presents the results of considering each of the objectives against each of the sustainability objectives sequentially.

Table 4 – LDF Objectives Appraisal Matrix

Key	
+	Compatible
x	Incompatible
?	Possible conflict
0	No links

Table 4 - LDF Objectives Appraisal Matrix

LDF Objective	Sustainability Appraisal Objective																		
	1 Actively support inclusive access to essential health, community and local services	2 Promote community involvement, voluntary and partnership working	3 Preserve and enhance the local historic environment and cultural heritage	4 Reduce crime, fear of crime and antisocial behaviour	5 Minimise detrimental noise impacts	6 Improve access to well designed, affordable, inclusive and appropriately located housing	7 Reduce health inequalities and promote healthy living	8 Protect and enhance open space	9 Protect and enhance the natural environment and biodiversity	10 Improve air quality	11 Reduce contributions to and vulnerability to climate change	12 Improve water quality, conserve water resources, and minimise the impact of flooding	13 Enhance existing buildings and facilities, and encourage the reuse / remediation of vacant land and under-utilised buildings	14 Reduce waste generation and increase waste recycling	15 Reduce vehicular dependency and promote the use of sustainable modes of transport	16 Promote local employment opportunities, training and skills attainment	17 Support sustainable economic growth	18 Improve opportunities for education and training	19 Promote cultural and community identity
1 Promoting exemplary design which gives proper respect to Ealing's heritage	+	+	+	+	+	+	+	+	?	+	+	+	?	?	+	0	+	0	+
2 Maximising the benefits of Ealing's green space for people and wildlife	+	+	+	+	+	?	+	+	+	+	+	+	+	+	+	?	+	+	+
3 Encouraging a cleaner, greener environment for Ealing through careful use of energy and resources	?	+	?	0	+	?	+	+	+	+	+	+	+	+	+	?	+	0	+
4 Ensuring sufficient, high quality accommodation for all Ealing's residents	?	+	?	+	x	+	+	x	X	x	x	x	+	x	x	+	+	0	+
5 Creating sustainable, safe and convenient transport networks for people and freight, to and through Ealing	+	+	+	0	+	+	+	+	+	+	+	+	0	+	+	0	+	0	0

Table 4 - LDF Objectives Appraisal Matrix

| | | Sustainability Appraisal Objective | | | | | | | | | | | | | | | | | | |
	LDF Objective	1 Actively support inclusive access to essential health, community and local services	2 Promote community involvement, voluntary and partnership working	3 Preserve and enhance the local historic environment and cultural heritage	4 Reduce crime, fear of crime and antisocial behaviour	5 Minimise detrimental noise impacts	6 Improve access to well designed, affordable, inclusive and appropriately located housing	7 Reduce health inequalities and promote healthy living	8 Protect and enhance open space	9 Protect and enhance the natural environment and biodiversity	10 Improve air quality	11 Reduce contributions to and vulnerability to climate change	12 Improve water quality, conserve water resources, and minimise the impact of flooding	13 Enhance existing buildings and facilities, and encourage the reuse / remediation of vacant land and under-utilised buildings	14 Reduce waste generation and increase waste recycling	15 Reduce vehicular dependency and promote the use of sustainable modes of transport	16 Promote local employment opportunities, training and skills attainment	17 Support sustainable economic growth	18 Improve opportunities for education and training	19 Promote cultural and community identity
6	Placing Ealing at the heart of West London's cultural, sports and leisure activity	+	+	+	+	0	+	+	+	?	0	0	+	+	0	+	+	+	+	+
7	Designing out crime and making Ealing's environment safe, attractive and accessible for all	+	+	?	+	0	+	+	+	+	+	+	0	+	0	+	0	+	0	+
8	Encouraging a healthy and independent population in Ealing	+	+	0	+	0	+	+	?	?	0	?	?	+	0	+	+	+	+	+
9	Achieving and sustaining prosperity for communities and businesses across Ealing	+	+	x	0	x	0	+	x	X	x	x	x	+	x	?	+	+	+	?
10	Making Ealing a great place for young people and children to grow up	+	+	+	+	+	+	+	+	+	+	+	?	+	?	+	+	+	+	+

Commentary on LDF Objectives Appraisal Matrix	
LDF Objective	**Comments**
1 Promoting exemplary design which gives proper respect to Ealing's heritage	Good practice in sustainable design will help protect local character and the historic environment and provide economic, social and environmental benefits. Exemplary design should contribute to new/improved open space and consequently may help to increase biodiversity by providing additional habitat, however, improvements to recreational open space which result in a reduced area of natural habitat could harm the natural environment. Sustainable new developments, appropriately located, will help to minimise the environmental effects of increased development within the borough. The enhancement and reuse of existing buildings and previously used land is preferable in environmental terms to new build, due to its increased resource efficiency, and this should be reflected in the design of sustainable new developments in the borough.
2 Maximising the benefits of Ealing's green space for people and wildlife	Improving accessibility to good quality open space provides health, well being and social benefits to the whole community. Protecting and enhancing recreational open space along with nature conservation areas to provide well connected Green Infrastructure will also provide natural habitat for biodiversity, flood mitigation, green routes to encourage walking and cycling, an educational resource, and an attractive environment to encourage economic prosperity and community identity. The design of open space must be carefully considered in order to minimise crime and the fear of crime. Conflicts may arise in the provision of new development for housing, business and community facilities, where these may impact on the area or quality of the borough's green space.
3 Encouraging a cleaner, greener environment for Ealing through careful use of energy and resources	Minimising resource use and increasing the reuse and recycling of resources are key to the sustainable development of the borough. Efficient use of resources is economically and environmentally sound, whilst promoting reuse and recycling at the domestic level also helps to enhance community identity through community schemes and education. Where it leads to increased development, improving accessibility to community facilities, jobs and housing may conflict with increasing resource efficiency. The historic environment may also be degraded by the adaptation of heritage buildings for other uses, if these uses are not appropriate and sympathetic to the historic fabric.
4 Ensuring sufficient, high quality accommodation for all Ealing's residents	The provision of sufficient, well located, appropriate, good quality and affordable housing stock for Ealing's growing population is essential to maintain healthy vibrant communities in the borough and provide a local workforce to sustain the borough's economic growth and minimise travel to and from work etc.. However, this is likely to require new build and may increase population, potentially conflicting with sustainability objectives relating to the protection of open space and the natural environment, and is likely to increase contributions to climate change, pollution and flood risk. There will also be increased requirements for essential community / health facilities, car use and pressure on all resources, although provision of housing close to transport hubs and places of work may help to reduce car use.
5 Creating sustainable, safe and convenient transport networks for people and freight, to and through Ealing	Measures to increase the use of sustainable modes of transport would have wide ranging economic, social and environmental benefits. Lower levels of pollution would help to reduce impacts on climate change and health and noise impacts would be reduced. The promotion of active forms of transport would also improve health, reduce congestion and potentially reduce the number of road traffic accidents. The provision of cycleways and footpaths would help to expand the borough's Green Infrastructure. Improved access between communities would also help to reduce social exclusion within the borough.
6 Placing Ealing at the heart of West London's cultural, sports and leisure activity	The provision of community facilities, accessible to everyone, would provide social and health benefits for the borough and the promotion of recreational facilities is likely to include open space provision, which may also provide natural habitat to increase biodiversity, and provide flood mitigation. The historic environment is also likely to be protected and its

		accessibility enhanced under this objective. The provision of community facilities close to people's homes would reduce the need to travel and associated negative impacts. Community facilities are also a vital educational resource. However, the provision of new facilities or enhancement of existing recreational areas may lead to an overall loss of green space.
7	Designing out crime and making Ealing's environment safe, attractive and accessible for all	Through 'designing out crime' in new developments, actual crime levels can be reduced, and the fear/perception of crime which impacts on many people's day-to-day lives, can be minimised. This will help to create cohesive communities throughout the borough and make places more accessible by public transport, cycle and on foot, resulting in fewer journeys by car and therefore reducing the associated negative impacts of car travel. Crime detracts from the attractiveness and economic prosperity of an area, and is associated with economic decline. Reducing crime should therefore contribute to a healthy economy for the borough. Measures to reduce crime may impact on the historic environment, and in this regard sensitive design would be needed to ensure that the historic fabric is not harmed.
8	Encouraging a healthy and independent population in Ealing	Social inclusion is key in creating sustainable communities. By improving accessibility to essential services, health and other social inequalities would be reduced, with positive impacts on the community as a whole, including improved health, independence, education and employment prospects, reduced crime levels and increased community cohesion. However, this objective may lead to development with associated negative impacts on environmental sustainability.
9	Achieving and sustaining prosperity for communities and businesses across Ealing	Maintaining economic growth and prosperity is essential for the sustainable future of Ealing. To achieve this, there must be development appropriate to the needs of existing businesses in the borough, and to attract new businesses. Appropriate employment and other business related development in town centres would have social benefits, as it would help to meet local needs, including through the use of legal agreements, reduce the need to travel for local services, and also ensure economic growth. However, it may have negative impacts, particularly on environmental sustainability due to increased use of resources and transport requirements. There may also be negative effects on the historic environment as existing buildings may be unsuitable for business use and need to be replaced.
10	Making Ealing a great place for young people and children to grow up	Maximising opportunities for children and young people and creating a suitably safe and attractive environment would have social benefits in promoting inclusion, and improving health, education and employment prospects. Improved facilities of this nature are likely to include the protection and enhancement of the historic and natural environment as important cultural and educational resources. Providing local facilities would reduce the need to travel and encourage walking and cycling. This objective is also likely to lead to reduced levels of crime and antisocial behaviour. However, it could lead to development with the associated negative impacts already discussed.

10. Identification of Initial Proposals

One of the key requirements of an SA is the identification and consideration of reasonable alternatives to a proposed plan or policy, to enable a comparison of the sustainability impacts of the proposed options for the Strategy. Article 5.1 of the SEA Directive requires that reasonable alternatives are identified, described and evaluated.

Following completion of the SA of the Issues and Options for the Development Management DPD, and informed by the results of this process, the Council has moved forward in developing Initial Proposals. The consultation invited alternative policy wordings and the document will continue to evolve towards the Final Proposals stage.

11. Appraisal Methodology

The Appraisal of the Development Management Issues and Options against the Council's Sustainability Framework has been conducted using matrices, whereby the impact of the Proposal against the Council's objectives is scored using the system detailed in Table 5 below.

Table 5 – Options Appraisal Matrices: Key

Key	
++	Major Positive
+	Minor Positive
	No impact
-	Minor Negative
- -	Major Negative
?	Uncertain

The appraisal matrices are accompanied by a commentary drawing out the key messages from the appraisal, along with a schedule of suggested changes that might mitigate any uncertainties or negative effects, or conversely that might build upon any strengths that have been identified.

As part of this process, consideration has also been given to the need for mitigation of negative effects. Mitigation can take a wide range of forms including:

- Changes to the DPD as a whole, including bringing forward new options, or adding or deleting options
- Refining policies in order to improve the likelihood of beneficial effects and to minimise adverse effects
- Technical measures to be applied during the implementation stage

Following the matrices, the findings from the tables are consolidated into a series of headlines. The suggested changes are then drawn together in a series of General and Specific Recommendations to be taken forward as the document evolves. It should be noted however that whilst the SA process does inform the decision making process, it is not the sole decision making tool, and there will be many other factors which also need to be considered in choosing between options and preparing the plan.

Note that the indicators within the matrices must not be treated in a purely quantitative fashion; they indicate how a policy, proposal or option performs against a specific objective. It will not always necessarily be that the option with the most '+' scorings will be the most sustainable option.

12. Uncertainties, Limitations and Assumptions

The Sustainability Appraisal process provides a useful tool in identifying issues and suggesting possible forms of mitigation. It tests the performance and robustness of policies against the Council's sustainability objectives. However, there are a number of uncertainties and limitations that exist in the sustainability appraisal process, which are summarised below:

- In a number of cases, indicators have been identified despite there being no baseline data currently available with which to establish trends or measure effects. It was not always possible to predict effects on the basis of qualitative data.
- There is a risk that officers may make their own assumptions about the possible effects arising from a particular option. However, consultation on the SA report is seen as adding value in allowing other 'experts' and interested stakeholders to review the effects identified.
- Difficulties have been identified in respect of predicting the impact of the DPD in the long term, which has further complicated the process of accurately appraising the sustainability of the strategy.
- Difficulties associated with and distinguishing between and separating out the influence of the DPD from other external factors. For example whilst the predicted trends for a particular baseline indicator may suggest that the situation is worsening over time, possibly because of various factors beyond the control of the DPD, the DPD itself may still have a positive influence.

13. Sustainability Appraisal Matrices for the Development Management Initial Proposals

The matrices analyse the sustainability of the Development Management Initial Proposals DPD. The full list of Headlines and Recommendations drawn from the matrices can be found in the following chapters.

Ealing Policy 4A	Employment uses Local Policy
A Change of use from employment uses, or the redevelopment of the site for a non-employment use, will only be granted where all of the following can be demonstrated; a the site is not viable for re-occupation (including renewal and refurbishment) b the site is not viable for redevelopment/renewal for an employment use (including small offices where appropriate) c the proposal does not constrain or introduce potential new conflicts with neighbouring employment uses **B** Where retaining a building or site in employment use is not viable the council will seek: a mixed use development which maximises the amount of employment space retained b use of the building or site for an alternative economic land use Employment Uses are those which fall within the B use classes plus other closely related uses commonly found on employment sites (for example garages and motor repair). Economic Land Uses are defined in paragraph 4 of PPS 4 (December 2009) and includes development within the B Use Classes, public and community uses and main town centre uses. It also includes other development which achieves at least one of the Following objectives: 1. Provides employment opportunities 2. Generates wealth or 3. Produces or generates an economic output or product A site is not viable for re-occupation as an employment use where it is not letable at a reasonable market rate for a period of six months or more. Redevelopment proposals undermine neighbouring employment uses where they create generate conflicting interests which did not previously exist. For example, residential development would undermine neighbouring employment uses where it would necessitate reductions in operating or delivery hours.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Policy 4A | Employment uses Local Policy.	+												+	+		++	+	?	

Commentary

Promoting and retaining economic activity in Ealing in appropriate locations will ensure that the Councils Sustainability Framework Objectives are met positively.

Suggested Changes

A more detailed definition of 'reasonableness' may be required in order to ensure that unsustainable uses are not permitted.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 4.5 | London's visitor infrastructure Hotel development in Ealing Borough is directed toward the Town Centres as	?							?							+	?	+	?	

defined in the Development Strategy, and to major transport hubs.																			

Commentary

Town centre and transport hub locations allow for use of sustainable transport modes, along with a range of other facilities and infrastructure.

Suggested Changes

None

Development Management Policies Initial Proposals																			
	Sustainability Objectives																		
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to Policy 4.7 Retail and town centre development Proposals for street markets will be approved where they will have a positive effect on the vitality and vibrancy of the town centre. Development will also be tested against other relevant policies including those covering amenity, 7B and 7C.	+	+	+				?						?		+	?	+	?	?

Commentary

The sustainable location of street markets can have a significant positive impact upon the local economy and community, providing an attractive retail and cultural offer.

Suggested Changes

None.

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Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 4.8 | Supporting a successful and diverse retail sector Applications for change of use of A1 units to A2 and A3 in designated and non-designated retail frontages will be permitted only where they do not result in more than 30 per cent of the total number of units being in non-A1 use. Where a frontage is designated, this percentage will be calculated based on the formal boundaries of the centre. Where it is not designated, the calculation will be based on the number of continuous or nearly continuous non residential units.	+					+							+		+		+		

Commentary

This policy ensures sustainable and balanced economic development of retail uses.

Suggested Changes

Explore the option for identifying whether the proposed shop will be for convenience or comparison goods as part of the planning application so as to encourage comparison or convenience shopping in accordance to the town centre hierarchy. The A1-A5 classification does not clearly reflect this distinction. A1 units in particular which are key in town centres can sell convenience or comparison goods. This could make the policy perform even better against Objective 17 "Support sustainable economic growth".

Ealing Policy 4B | 'A' use classes
Local Policy

A New A class development must have particular concern for its surroundings and neighbouring uses. Poor façade design is sufficient reason for refusal.
B New development must not result in over-concentration of a particular use type where this use may erode local amenity by nature of that concentration.
C Standards applying to common types of 'A' use class development are set out at the table below.

The A use classes are particularly important to the public realm as they present a highly visible public face and have a prominent role in Town Centres. In addition to standard design concerns, it is particularly important that new façades add quality and character to town centres. Some uses may be acceptable as individual units but can erode the quality of the townscape and range of service offer when they concentrate in large numbers

Type of Use Restrictions

Fast food outlets, Amusement Arcades Outside of town centres are not permitted within 400m radius of existing schools or youth centred facility (e.g. YMCA, after school club). Must have particular regard for the existing townscape in the design of signage and façade. Each new unit must be separated from any unit or group of units by at least two units of other uses.
Night-time uses Must consider neighbouring uses especially residential. Officers will have particular concern for over-concentrations of these uses.

Initial Proposal	Sustainability Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Policy 4B | 'A' use classes Local Policy			++	+	+		++												+

Commentary

This policy performs strongly, particularly with regard to Objective 7 reducing health inequalities. Locating fast food outlets a measured distance from schools is one way that the planning system can tackle public health issues such as childhood obesity.

Suggested Changes

It could be noted that 'signage and shopfronts could be designed to enhance or positively reflect local character'.

Initial Proposal	Sustainability Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 4.9 | Small Shops The council will seek contributions to the development of small shop units also from large residential schemes where these schemes are not within a 400m radius of existing local shops. These contributions will generally be in the form of small shop units on site. Large residential schemes, those of 50 units or more, which are located outside of convenient walking distance of existing shopping provision will create demand for local convenience retail units. This demand should be satisfied on site by the provision of at least one small shop unit on a publicly accessible street frontage.	++					+									++		+		+

Commentary
This policy helps to ensure that SA Objective 1 'Actively support inclusive access to essential health, community and local services' is met.
Suggested Changes
None

Ealing Local Variation to RLP Policy 5.2 | Minimizing carbon dioxide emissions
New development should aim to achieve the requirements in RLP Policy 5.2 through the best practice standards set out in the table below. This table describes realistic targets for Energy Efficiency Measures (EEM), Combined Heat and Power (CHP) and Renewable Energy Systems (RES). Major applications must include an energy assessment that demonstrates how reductions in the emissions of CO2 have been achieved.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 5.2 | Minimizing carbon dioxide emissions			?			+	+		+	+	++						+		

Commentary
Policy performs strongly against SA Objectives.
Suggested Changes
Where the text refers to "new development", it is not clear whether this applies to all development or only to major developments. The London Plan policy is about Major Development, so this should be clarified in the text.

Ealing Policy 5A | Building Efficiency and Renewable Energy
Local Policy

A New development must demonstrate full consideration of CHP.
B The council may require new development to connect to district heating systems as and when these are developed in the borough
C New development which falls below the threshold of major development must achieve emissions savings according to the table below
D Residential extensions must incorporate reasonable energy efficiency measures up to 10% of the value of building works.
These measures will be applied to the whole dwelling.
A significant proportion of the residential development in the borough falls outside of the category of major development. It is necessary for this development also to make a contribution to the
Reasonable energy efficiency measures for extensions and conversions are any forms of energy efficiency measure which are available at reasonable cost to a given development, such as
increased insulation and improved boiler equipment. The 10 per cent figure is a maximum and will not be required in all cases.
For those developments where the overall CO2 emission targets did not exceed the minimum carbon emission savings established in Policy 5.2 of the Draft Replacement London Plan, the Council
will encourage applicants to demonstrate that they have fully considered measures to satisfy the London Plan policy.

	Development Management Policies Initial Proposals																		
	Sustainability Objectives																		
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Policy 5A | Building Efficiency and Renewable Energy Local Policy			?		+				+	+	++	+					+		

Commentary

This policy meets its objective of minimizing carbon dioxide emissions well. There is scope to clarify the type of development that the policy applies to as per the comments made below, explain the table better and address the energy efficiency of heritage assets.

Suggested Changes

When referring to new development at the outset, clarify whether it is all new development or new major development, especially as the distinction between "new development" and "residential development which falls outside of the category of major development" is drawn later on in the text. For section A suggest 'All new development'.

Cross reference policy 5.6 Decentralized energy in development proposals because points A and B could also be variations on this policy.

Ealing Local Variation to RLP Policy 5.10 | Urban greening

Development proposals should retain existing trees and plantings on the basis of no net loss of amenity. Trees subject to Tree Protection Orders must be retained intact and in situ.

Development proposals will generally be required to make provisions for trees or plantings on site to replace those which are lost in consequence of building or building works. While the extent and location of the planting need not necessarily be the same afterward as it was before, the quality and type of amenity should be the same. For instance, where a site offered space that was inhabitable by users of the building it will not be acceptable for this provision to be replaced by, for example, green walls.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 5.10	Urban greening	+							+	+		+	+					+		

Commentary

This policy performs strongly against the SA Objectives.

Suggested Changes

None

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Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
**Ealing Local Variation to RLP Policy 5.11	Green roofs and development site environs** Green roofs should also be considered in the design of smaller schemes; they may be acceptable in respect of open space requirements for a given development where proper public access is ensured.	+		+					+	?	+	+	+					+		?

Commentary

The policy performs strongly against SA Objectives.

Suggested Changes

It could be noted that green roofs should be considered for all smaller schemes including conversions.

Ealing Local Variation to RLP Policy 5.12 | Flood risk management

A All development, including that on land that is not on a defined floodplain, must ensure that it is not vulnerable to drainage and groundwater flooding.

B New development that reduces the extent of the floodplain or is in any way vulnerable to flooding will not be permitted within an 8m buffer strip along all main rivers, and a 5m undeveloped buffer strip alongside all ordinary watercourses.

C There is a general presumption against the hardstanding of domestic gardens and public open space.
This policy is without prejudice to the detailed recommendations of the Ealing SFRA.

Flood risk in Ealing is primarily from surface water and sewer systems, however, the south east corner of the borough is also part of the Thames floodplain. All development proposals brought forward for the south east corner of the borough must therefore also refer to the Hammersmith and Fulham SFRA to determine that there is no potential flood risk during a breach event. For cases where this cannot be determined, FRA specific Breach Analysis should be carried out.
The restrictions that operate in the buffer zones of watercourses mean that in practice the only development that will be allowed in these areas is occasional uses such as outdoor seating areas or water/electricity facilities for canal boats.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
**Ealing Local Variation to RLP Policy 5.12	Flood risk management**						+		+			+	++					+		

Commentary

Managing flood risk is a vital part of planning. Development in the wrong locations, or that uses insufficient mitigation measures, can have negative effects.

Suggested Changes

None

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
**Ealing Local Variation to RLP Policy 5.21	Contaminated land** Contaminated land must be treated in a manner appropriate for its end use. Evidence of the appropriateness of the measures taken must be submitted as part of the planning application. Officers can advise on the correct approach to the development of contaminated land as part of pre-application engagement.						+	+		?			?	+	+			?		

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 6.9 | Cycling Major development that is on or near a footpath of a cycle route identified on the borough network will contribute to enhancing the route and (if necessary) improving access between the development site and the route.	++					+	+			+	+				++		?		

Commentary

Access to cycling networks and footpaths is useful in providing people with alternatives options to the private car. This has a positive effect on a range of the SA Objectives.

Suggested Changes

None

Ealing Local Variation to RLP Policy 6.14 | Freight

Warehouse development in Ealing Borough will be directed toward the Major Employment Locations in line with the findings of the Employment Land Review.
Permission will be granted for freight development where the benefits of employment are judged to outweigh the generation of noise and congestion. Officers will restrict the permitted hours of servicing and operation, and the size of vehicle making delivery where this is necessary to protect local amenity. Hours of servicing and operation, and the size of vehicle making delivery will restricted in line with Ealing Policy 7A, on the principle of preserving the amenity of surrounding uses.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 6.14 | Freight			?		+					+	?	?		?	++	+	++		

Commentary

This policy minimises negative effects from noise and disruption from freight.

Suggested Changes

None

Ealing Policy 7A | Operational amenity Local Policy

A
New development which in the course of its operations causes any sort of emissions must;
a not erode the amenity of surrounding uses
b take all reasonable steps to ameliorate these emissions
c provide all reasonable evidence of mitigation that is requested by the council
B
The requirement to properly regulate and ameliorate emissions also applies to functionally separate areas within a given development, for instance between separate flats or dwellings.
C
Applicants should seek advice as to the most appropriate forms of evidence and mitigation for their proposed development.
D
Development which is sensitive to operational emissions of a particular type must avoid locating in areas in which there are established concentrations of such emissions.
All forms of development are potential sources of operational emissions that may erode the amenity of surrounding uses.
Types of emissions will typically include, but are not limited to; noise, vibration, particulate matter, odour, light, and electromagnetic
radiation.
Sensitive uses will typically include, but are not limited to; residential, schools, hospitals, public open space, and nature sites.
Emissive uses will typically include, but are not limited to; waste processing, manufacturing, radio/telephone masts, and all vehicle serviced uses.
The obligation to safeguard amenity is reciprocal between all use types. Developments of sensitive uses should avoid exposure to
established concentrations of emissions just as developments of emissive uses should limit their impact on the surrounding environment.
Sensitive uses will not be permitted where these would achieve acceptable levels of amenity only by sealing residents or users off from their surrounding environment. Such isolation would
constitute in and of itself an erosion of amenity.
Context
The context of the new development is the primary determinant of what levels of emissions will be acceptable, and what measures are necessary for their attenuation. For example, residential uses
are unlikely to cause disturbance to other residential uses simply by nature of their proximity
Layout

Layout of a development is a principal consideration in safeguarding amenity. Co-location of disruptive functions, such as 'stacking'
of kitchens and bathrooms in flatted development can help to reduce loss of amenity for residents. Similarly, over-concentration of, for example, mechanical ventilation units can create unacceptable levels of noise at a given location.

Noisy developments, for example, could seek to ameliorate their emissions through greater sound insulation, by changing access points, or by screening part or all of the site.

Cumulative Impact

Particular attention should be paid to the risk of cumulative impact. Development close to use types which make similar emissions (for example of one mobile telephone mast in proximity to another) should take the existing context of emissions into account in its development proposals.

Suitable Evidence

The type of evidence of mitigation will vary according to the type of emissions involved. In the case of development of mobile */elephone masts, for example, International Commission on Non-Ionising Radiation Protection (ICNIRP) certification is typically the most useful source of information. Applicants should seek advice as to the evidence which is most relevant to their application.

Refusal

Any development which is unable to effectively remediate emissions that cause significant loss of amenity to surrounding uses should be refused.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Policy 7A | Operational amenity Local Policy			+		++	+	+			+	+	+		+			+		

Commentary

This policy performs strongly against the Councils sustainability objectives.

Suggested Changes

None

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 7.2 | An inclusive environment All new residential development must be constructed to the Lifetime Homes standard.						++	+												

Commentary

Lifetime Homes standards allow properties to be flexible in their layout and design, to enable changes to be made more easily to the property, as the needs of occupants vary over time. The standards ae seen as a way of helping to produce environments and homes that are inclusive for all people.

Suggested Changes

None

Ealing Local Variation to RLP Policy 7.3 | Secured by design

Applicants must present evidence at the time of application that they have consulted with the local Metropolitan Police Crime Prevention Design Advisor (CPDA).
Development must not place unreasonable pressure on police resources.
Development should make contributions to community safety works where appropriate.

The Metropolitan Police provide a vital service to applicants and the Local Planning Authority through the CPDA. This service is intended to function as a form of pre-application advice and should inform the design of schemes from an early stage. The principal interest of the CPDA will be in new dwellings (including conversions) and central areas applications.
Residential conversions may result in unsuitable lines of access or insecure placement of doors etc. These schemes will particularly benefit from the advice of the CPDA.
Unreasonable pressure on police resources is defined as pressure which is avoidable through affordable changes to design or layout, or basic security measures like gating etc.

Community safety works are minor works such as gating alleys. Development can make contributions to these works either financially or in kind. Where appropriate, the council will seek to co-ordinate the measures employed by neighbouring schemes to achieve the greatest possible increase in security

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 7.3 | Secured by design	+	+		++		+								+						

Commentary

The policy performs strongly, particularly with regard to SA Objective 4: Reduce crime, fear of crime and antisocial behaviour.

Suggested Changes

None

Ealing Policy 7B | Design amenity Local Policy

A
New development must achieve a high standard of amenity for users and a good relationship with adjacent uses by avoiding;
a material lack or loss of daylight or sunlight
b unreasonable lack or loss of privacy
c piecemeal development of the site
d overdevelopment of the site
f illegibility
B
Development adjacent to residential uses must have particular concern for amenity. Similarly, residential schemes which do not provide satisfactory amenity for residents will not be permitted.
C
All external treatments, fittings and materials must complement original building/site and must not impair the visual amenity of surrounding uses.
High quality design is essential to all development and offers the opportunity to overcome constraints which would otherwise prevent the implementation of a development scheme.

Material lack or loss of daylight or sunlight is a lack or loss of daylight or sunlight below the current level and which could significantly affect the amenity of internal rooms or external spaces within the curtilage of the building. In the case of residential development, for example, this makes it unlikely that single aspect dwellings will be an acceptable form of development. This shorthand definition is not taken to contradict the Building Research Establishment publication *Site layout planning for daylight and sunlight: a guide to good practice* (1991), which constitutes the main technical guidance on this topic.
Unreasonable lack or loss of privacy is a lack or loss of privacy below that which might reasonably be expected for the use type concerned. For example, residential accommodation could be reasonably expected not to suffer direct overlooking of internal spaces. External spaces within the curtilage of a building, however, including private gardens, will typically be subject to some overlooking and consequent limitations to privacy.

Piecemeal development is that which does not successfully resolve into a coherent scheme for the given site, whether or not it is undertaken at separate times. Symptoms of piecemeal development may include broken or ragged external spaces offering poor amenity to users, mismatched building materials, and poorly designed massing or changes in scale.

Overdevelopment of the site is considered to be any level of build which is untypical of local character or morphology in massing or extent of site coverage, and which is not specifically permitted in area development plans or the Development Strategy.

Development which is untypical of local character in the extent of site coverage may be acceptable where it is accompanied by high quality design and resolves successfully as a completed scheme, see *back land and infill development* below.
Negative visual impact is any visual impact on neighbouring uses or more generally which is negative due to the size, location, or design of the development. All development must have regard for visual impact, including more minor developments

Illegibility is when the access and function of a building or site are difficult to discern to the extent that they impair the successful use
of the building. In addition to causing access problems, illegible developments can create unsafe spaces

Back land and Infill development
Urban infill and development on back sites offers scope for additional residential and other provision through intelligent architectural
treatments. By definition this sort of development is a deviation from the local character or urban morphology. The infilling of back land, for example, requires that this land has previously been preserved in the form of service yards, back gardens etc. This form of
development can therefore only be acceptable where it achieves good quality internal spaces and does not compromise the amenity of surrounding uses. Proposals of this sort, therefore, will be particularly scrutinised for loss of light and privacy to adjacent uses, good internal space and layouts, and sufficient remaining amenity/garden space.

Residential Uses
The Replacement London Plan encourages consideration of the home as a place of retreat, and residential uses have particular
need for privacy and quiet. This obligation is reciprocal both to new development which will impact upon adjacent residential uses
and to new residential developments themselves. Applications for residential use will be subject to greater scrutiny of their quality of
amenity than will other applications. Particular consideration will be given to use of residential buildings at night as this use is unusual in being occupied chiefly at this time.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Policy 7B | Design amenity Local Policy	+		?	+	+	+							+				+		

Commentary

This policy helps the Council to achieve SA Objective 6: Improve access to well designed, affordable, inclusive and appropriately located housing.

Suggested Changes

None

Ealing Local Variation to RLP Policy 7.7 | Location and design of tall and large buildings

Tall buildings will only be permitted where they;

a accord with the spatial objectives of the Development Strategy
b offer an outstanding quality of design
c make a positive contribution to the urban environment
Tall buildings have a greater impact on their surroundings and on the borough as a whole than other forms of development, as such, they must be held to higher standards than other development which will be less visually prominent. If the proposal complies with the spatial guidance of the Development Strategy, then the primary consideration for any scheme is therefore that it makes a positive contribution to the urban environment.

After its location, the quality of design is the overriding consideration in assessing the appropriateness of a tall building.
This includes the suitability of the proposed design to its surroundings.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 7.7	Location and design of tall and large buildings			? ?														+		

Commentary

Tall buildings may have a variety of positive effects in sustainability terms, enabling greater access to services, however they must be located in suitable locations were they compliment or enhance the existing urban morphology.

Suggested Changes

The opportunity for mixed-use development in tall and large buildings could be noted in this policy. There is a particular opportunity for co location of residential / businesses with schools or other public services, with the former providing rent to the latter.

Ealing Policy 7C | Heritage

A
Development of any heritage asset or its setting must be made with reference to relevant guidance and statutory protections.
B
Development within or adjacent to Conservation Areas must be guided by the relevant conservation area appraisal.
Listed buildings, Ancient Monuments and Archaeological Interest Areas are subject to statutory protections that apply irrespective of any local or regional planning policies.

Local Designations
Local policy extends these protections also to buildings of local importance, whether as a whole structure in the case of Locally Listed Buildings, or because of specific features in the case of buildings of Façade Value or Incidental Features.
Local designations may be awarded to buildings singly or in groups in recognition of
- historical or aesthetic merit
- prominence within or importance to the townscape
It is the responsibility of the applicant to demonstrate why their development is a suitable use of a heritage asset. If the significance of a local designation is questioned then this should be in the form of a conservation appraisal from an appropriately qualified body or individual, for example, English Heritage.

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
**Ealing Policy 7C	Heritage**			++														+		++

Commentary

Heritage assets can be a part of local character and identity, and their sensitive use can be managed to ensure that they play an important role in Ealing's future.

Suggested Changes

None

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 7.12 | Implementing the London View Management Framework The above principles will also apply to Ealing's local protected views. (These are the same as mapped in the current 2004 UDP). There are no special constraints in Ealing specifically relating to World Heritage Sites.			+										+						++

Commentary

Ealing's protected views contribute to the identity of local areas.

Suggested Changes

None

Development Management Policies Initial Proposals																			
Sustainability Objectives																			
Initial Proposal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Ealing Local Variation to RLP Policy 7.14 | Improving air quality As required by national policy, planning applications should include an Air Quality Assessment. The council will have particular concern for cumulative impact of development on air quality			+				+		+	++	+								

Commentary

This policy performs well against environmental objectives.

Suggested Changes

None

14. Headlines from Matrices

Strengths

Objective 17 "support sustainable economic growth" is the most widely addressed objective. The Second most widely addressed objective is Objective number 6 "Improve access to well designed affordable inclusive and appropriately located housing" Objective one " Objective 1: actively support inclusive access to essential health community and local services" is also very well adressed.

Uncertainties

The least well adressed objective is objective 18 "improve opportunities for education and training". Another objective seldom addressed by the policies assessed is objective 16 "promote local employment opportunities, training and skills attainment". This is also the case of objective 2 "community involvement voluntary and partnership working". Due to the fact that policies can only be truly tested through implementation, there will always be an element of uncertainity surrounding how they score around the SA objectives.

Negative effects

No significant negative effects were identified for the Development Management DPD, as the nature of the policies is to manage development in order to produce positive planning outcomes.

15. Specific Recommendations

The appraisal process has produced a number of specific recommendations to be taken forward:

Policy	Suggested change
Ealing Policy 4A | Employment uses Local Policy.	A more detailed definition of 'reasonableness' may be required in order to ensure that unsustainable uses are not permitted
Ealing Local Variation to RLP Policy 4.8 | Supporting a successful and diverse retail sector	Explore the option for identifying whether the proposed shop will be for convenience or comparison goods as part of the planning application so as to encourage comparison or convenience shopping in accordance to the town centre hierarchy. The A1-A5 classification does not clearly reflect this distinction. A1 units in particular which are key in town centres can sell convenience or comparison goods. This could make the policy perform even better against Objective 17 "Support sustainable economic growth".
Ealing Policy 4B | 'A' use classes Local Policy	It could be noted that 'signage and shopfronts could be designed to enhance or positively reflect local character'.
Ealing Local Variation to RLP Policy 5.2 | Minimizing carbon dioxide emissions	Where the text refers to "new development", it is not clear whether this applies to all development or only to major developments. The London Plan policy is about Major Development, so this should be clarified in the text.

Ealing Policy 5A | Building Efficiency and Renewable Energy Local Policy	When referring to new development at the outset, clarify whether it is all new development or new major development, especially as the distinction between "new development" and "residential development which falls outside of the category of major development" is drawn later on in the text. For section A suggest 'All new development'. Cross reference policy 5.6 Decentralized energy in development proposals because points A and B could also be variations on this policy.
Ealing Local Variation to RLP Policy 5.11 | Green roofs and development site environs	It could be noted that green roofs should be considered for all smaller schemes including conversions.
Ealing Local Variation to RLP Policy 7.7 | Location and design of tall and large buildings	The opportunity for mixed-use development in tall and large buildings could be noted in this policy. There is a particular opportunity for co location of residential / businesses with schools or other public services, with the former providing rent to the latter.

16. 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 this report:

- The formation of 'hybrid' options, 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.
- Appropriate policy within the Development Management or Development Strategy DPD's regarding issues around urban design, noise or air pollution for example.
- Pointing to the appropriate document where issues identified might be dealt with (e.g. other DPD or a forthcoming SPD)

17. Monitoring

The SEA directive requires that the Environmental 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. Further details on the monitoring process will be outlined in subsequent publications.

18. Future Work / Next Steps

The next stage (B3, Part 3) in the SA process will be to undertake an Appraisal of the Initial Proposals published for consultation in January 2010.

The findings from the Development Management Initial Options Sustainability Appraisal will feed into the next draft of the DMDPD document. The final proposals will be submitted in December 2011.

Appendices

Appendix 1 - Glossary of Terms

This Glossary is neither a statement of law nor an interpretation of the law, and its status is only as a guide and should not be used as a source for statutory definitions.

Climate Change
Long-term changes in temperature, precipitation, wind and all other aspects of the Earth's climate. Often regarded as a result of human activity and fossil fuel consumption.

Communities and Local Government
'Communities and Local Government' is the successor department to the Office of the Deputy Prime Minister (ODPM). It is an expanded department with a powerful new remit to promote community cohesion and equality, as well as responsibility for housing, urban regeneration, planning and local government

Development Plan Document
Development Plan Documents are prepared by local planning authorities and outline the key development goals of the local development framework.
Development Plan Documents include the core strategy and, where needed, area action plans. There will also be an adopted proposals map that illustrates the spatial extent of policies that must be prepared and maintained to accompany all DPDs. All DPDs must be subject to rigorous procedures of community involvement, consultation and independent examination, and adopted after receipt of the inspector's binding report. Once adopted, development control decisions must be made in accordance with them unless material considerations indicate otherwise. DPDs form an essential part of the Local Development Framework.

Development Strategy
The Core Strategy, a Development Plan Document setting out the spatial vision and strategic objectives of the planning framework for an area, having regard to the Community Strategy (see also DPDs).

English Heritage
Government advisors with responsibility for all aspects of protecting and promoting the historic environment. English Heritage is responsible for advising the government on the listing of historic buildings.

Environment Agency
A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters and deals with other matters such as water issues including flood protection advice.

Evidence Base
The information and data gathered by local authorities to justify the "soundness" of the policy approach set out in Local Development Documents, including physical, economic, and social characteristics of an area.

Habitat Directive
Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ('Habitat Directive'). The EU Habitats Directive and Birds Directive are implemented in the UK through the Conservation (Natural Habitats) Regulations 1994 (as amended).

Habitat Directive Assessment (HDA)
Also known as an Appropriate Assessment (AA). An Assessment must be conducted if an initial scoping identifies sites listed under the Directive.

Issues and Options
The non statutory 'front loading' stage in the development of a DPD. An authority publishes the document for consultation, setting out the possible approaches it might take and the key decisions which will need to be made as the plan progresses.

Lifetime Homes Standards
Criteria developed by a group convened by the Joseph Rowntree Foundation in 1991 to help house builders produce new homes flexible enough to deal with changes in life situations of occupants e.g. caring for young children, temporary injuries, declining mobility with age.

Local Development Document
These include Development Plan Documents (which form part of the statutory development plan) and Supplementary Planning Documents (which do not form part of the statutory development plan). LDDs collectively deliver the spatial planning strategy for the local planning authority's area.

Local Development Framework

The Local Development Framework (LDF) is a non-statutory term used to describe a folder of documents, which includes all the local planning authority's local development documents. An LDF is comprised of:

- Development Plan Documents (which form part of the statutory development plan)
- Supplementary Planning Documents

The local development framework will also comprise of:

- Statement of Community Involvement
- Local Development Scheme
- Annual Monitoring Report
- Any Local Development Orders or Simplified Planning Zones that may have been added

Local Planning Authority

The local authority or council that is empowered by law to exercise planning functions. Often the local borough or district council. National parks and the Broads authority are also considered to be local planning authorities. County councils are the authority for waste and minerals matters.

Natural England

Natural England is the Government's statutory adviser on landscape in England, with responsibility for landscape designations such as National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts. Natural England is also concerned with England's future landscapes, with involvement in planning policy and a range of environmental land management projects. Natural England incorporates the former bodies of English Nature and the Countryside Agency.

Planning and Compulsory Purchase Act 2004 (PCPA)

The Act updates elements of the 1990 Town & Country Planning Act. The Planning and Compulsory Purchase Act 2004 introduces:

- a statutory system for regional planning
- a new system for local planning
- reforms to the development control and compulsory purchase and compensation systems
- removal of crown immunity from planning controls.

Planning Policy Guidance (PPG)

Issued by central government setting out its national land use policies for England on different areas of planning. These are gradually being replaced by Planning Policy Statements.

Planning Policy Statement (PPS)
Issued by central government to replace the existing Planning Policy Guidance notes in order to provide greater clarity and to remove from national policy advice on practical implementation, which is better expressed as guidance rather than policy.

Ramsar Sites
Sites designated under the European Ramsar Convention to protect wetlands that are of international importance, particularly as waterfowl habitats.

Regional Assembly / Regional Planning Body (RPB)
Each of the English regions outside of London has a regional chamber that the regions generally call Regional Assemblies (not to be confused with the term Elected Regional Assemblies). They are responsible for developing and co-ordinating a strategic vision for improving the quality of life in a region. The assembly is responsible for setting priorities and preparing certain regional strategies, including the Regional Spatial Strategy.

Regional Development Agency (RDA)
The nine Regional Development Agencies (RDAs) set up in the English regions are non-departmental public bodies. Their primary role is as a strategic driver of regional economic development in their region. The RDAs aim is to:

- Co-ordinate regional economic development and regeneration
- Enable the regions to improve their relative competitiveness
- Reduce the imbalances that exist within and between regions

Regional Spatial Strategy (RSS)
A strategy for how a region should look in 15 to 20 years time and possibly longer. The Regional Spatial Strategy identifies the scale and distribution of new housing in the region, indicates areas for regeneration, expansion or sub-regional planning and specifies priorities for the environment, transport, infrastructure, economic development, agriculture, minerals and waste treatment and disposal. Most former Regional Planning Guidance is now considered RSS and forms part of the development plan. Regional Spatial Strategies are prepared by Regional Planning Bodies.

SA Objective
Ealing has 19 Sustainability Objectives, which were formulated through the Scoping Report. Divided into social, environmental and economic categories, each of the objectives is used to appraise plans and policies in terms of their sustainability performance.

Scoping Report
This includes baseline information about Ealing and identifies key environmental and sustainability issues for the Borough. The objectives and framework for conducting Sustainability Appraisals of plans and policies is set out in this report.

Securing the future – New UK Sustainable Development Strategy (2005)
The strategy builds on the 1999 strategy 'A better quality of life: a strategy for sustainable development in the UK'. The strategy has five basic principles and four agreed priorities, namely sustainable consumption and production, climate change, natural resource protection and sustainable communities.

Special Areas for Conservation (SACs)
A site designated under the European Community Habitats Directive, to protect internationally important natural habitats and species.

Special Protection Areas (SPAs),
Sites classified under the European Community Directive on Wild Birds to protect internationally important bird species.

Statutory consultees
Individuals or organisations that the local authority is bound to consult with by law (statute).

Strategic Environmental Assessment (SEA)
An environmental assessment of certain plans and programmes, including those in the field of planning and land use, which complies with the EU Directive 2001/42/EC. The environmental assessment involves:
- Preparation of an environmental report
- Carrying out of consultations
- Taking into account of the environmental report and the results of the consultations in decision making
- Provision of information when the plan or programme is adopted
- Showing that the results of the environment assessment have been taken into account

Submission Document

A Development Plan Document submitted to the Secretary of State for independent examination by a government-appointed planning inspector.

Sustainability Appraisal (SA)

An appraisal of the economic, environmental and social effects of a plan from the outset of the preparation process to allow decisions to be made that accord with sustainable development.

Sustainable development

A widely used definition drawn up by the World Commission on Environment and Development in 1987: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." The government has set out four aims for sustainable development in its strategy A Better Quality of Life, a Strategy for Sustainable Development in the UK. The four aims, to be achieved simultaneously, are:

- Social progress which recognises the needs of everyone
- Effective protection of the environment
- Prudent use of natural resources
- Maintenance of high and stable levels of economic growth and employment.

Appendix 2 – SA Objectives Appraisal Matrix

Key	
✓	Compatible
✗	Incompatible
?	Possible conflict
0	No links

Sustainability Appraisal Objective	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
	Actively support inclusive access to essential health, community and local services	Promote community involvement, voluntary and partnership working	Preserve and enhance the local historic environment and cultural heritage	Reduce crime, fear of crime and antisocial behaviour	Minimise detrimental noise impacts	Improve access to well designed, affordable, inclusive and appropriately located housing	Reduce health inequalities and promote healthy living	Protect and enhance public open space	Protect and enhance the natural environment and biodiversity	Improve air quality	Reduce contributions to and vulnerability to climate change	Improve water quality, conserve water resources, and minimise the impact of flooding	Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings	Reduce waste generation and increase waste recycling	Reduce vehicular dependency and promote the use of sustainable modes of transport	Promote local employment opportunities, training and skills attainment	Support sustainable economic growth	Improve opportunities for education and training	Promote cultural and community identity
1																			

60

Sustainability Appraisal Objective	1 Actively support inclusive access to essential health, community and local services	2 Promote community involvement, voluntary and partnership working	3 Preserve and enhance the local historic environment and cultural heritage	4 Reduce crime, fear of crime and antisocial behaviour	5 Minimise detrimental noise impacts	6 Improve access to well designed, affordable, inclusive and appropriately located housing	7 Reduce health inequalities and promote healthy living	8 Protect and enhance public open space	9 Protect and enhance the natural environment and biodiversity	10 Improve air quality	11 Reduce contributions to and vulnerability to climate change	12 Improve water quality, conserve water resources, and minimise the impact of flooding	13 Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings	14 Reduce waste generation and increase waste recycling	15 Reduce vehicular dependency and promote the use of sustainable modes of transport	16 Promote local employment opportunities, training and skills attainment	17 Support sustainable economic growth	18 Improve opportunities for education and training	19 Promote cultural and community identity
2	✓																		
3	?i	✓																	
4	✓	✓	?ii																
5	0	0	?xii	0															
6	✓	✓	?i	✓	✓														
7	✓	✓	0	0	✓	✓													

Sustainability Appraisal Objective	1 Actively support inclusive access to essential health, community and local services	2 Promote community involvement, voluntary and partnership working	3 Preserve and enhance the local historic environment and cultural heritage	4 Reduce crime, fear of crime and antisocial behaviour	5 Minimise detrimental noise impacts	6 Improve access to well designed, affordable, inclusive and appropriately located housing	7 Reduce health inequalities and promote healthy living	8 Protect and enhance public open space	9 Protect and enhance the natural environment and biodiversity	10 Improve air quality	11 Reduce contributions to and vulnerability to climate change	12 Improve water quality, conserve water resources, and minimise the impact of flooding	13 Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings	14 Reduce waste generation and increase waste recycling	15 Reduce vehicular dependency and promote the use of sustainable modes of transport	16 Promote local employment opportunities, training and skills attainment	17 Support sustainable economic growth	18 Improve opportunities for education and training	19 Promote cultural and community identity
8	✓	✓	✓	✓	✓	?iii	✓												
9	0	0	✓	0	✓	✗iv	✓	✓											
10	✓xiii	✓	✗xiv	0	0	?v	0	✓	✓										
11	0	✓	?vi	0	✓	?vii	✓	✓	✓	✓									
12	?viii	0	0	0	0	?viii	0	✓	✓	✓	✓								

Sustainability Appraisal Objective	1 Actively support inclusive access to essential health, community and local services	2 Promote community involvement, voluntary and partnership working	3 Preserve and enhance the local historic environment and cultural heritage	4 Reduce crime, fear of crime and antisocial behaviour	5 Minimise detrimental noise impacts	6 Improve access to well designed, affordable, inclusive and appropriately located housing	7 Reduce health inequalities and promote healthy living	8 Protect and enhance public open space	9 Protect and enhance the natural environment and biodiversity	10 Improve air quality	11 Reduce contributions to and vulnerability to climate change	12 Improve water quality, conserve water resources, and minimise the impact of flooding	13 Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings	14 Reduce waste generation and increase waste recycling	15 Reduce vehicular dependency and promote the use of sustainable modes of transport	16 Promote local employment opportunities, training and skills attainment	17 Support sustainable economic growth	18 Improve opportunities for education and training	19 Promote cultural and community identity
13	✓	✓	✓	✓	✓	✓	0	✓	✓	✓	✓	✓							
14	0	✓	0	0	0	✓	0	0	✓	✓	✓	✓	✓						
15	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓				
16	✓	✓	0	✓	0	0	0	0	0	0	0	0	✓	✓	0				
17	✓	✓	?ix	✓	✓	✓	0	?	0	?	?	?x	✓	0	✓	✓			
18	✓	✓	✓	✓	0	0	0	0	0	0	0	0	0	0	0	✓	✓		

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Sustainability Appraisal Objective	Actively support inclusive access to essential health, community and local services	Promote community involvement, voluntary and partnership working	Preserve and enhance the local historic environment and cultural heritage	Reduce crime, fear of crime and antisocial behaviour	Minimise detrimental noise impacts	Improve access to well designed, affordable, inclusive and appropriately located housing	Reduce health inequalities and promote healthy living	Protect and enhance public open space	Protect and enhance the natural environment and biodiversity	Improve air quality	Reduce contributions to and vulnerability to climate change	Improve water quality, conserve water resources, and minimise the impact of flooding	Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings	Reduce waste generation and increase waste recycling	Reduce vehicular dependency and promote the use of sustainable modes of transport	Promote local employment opportunities, training and skills attainment	Support sustainable economic growth	Improve opportunities for education and training	Promote cultural and community identity
19	✓	✓	✓	✓	✓	✓	✓	✓	✓	0	0	✓	✓	0	✓	0	✓	0	

Notes regarding compatibility of SA objectives:

[i] Ensuring access and inclusion for all without causing harm to the historic environment will require careful attention to design

[ii] Designing out crime without causing harm to the historic environment will require careful attention to design

[iii] This objective is likely to lead to new development; this may increase and/or improve the available public open space in the borough, however, it may also result in a conflict where public open space is at risk from development.

[iv] When ensuring access for all, with potential development of new facilities, the need to protect the natural environment must be taken into account.

[v] This objective is likely to lead to new development, which may result in increased pressure on the natural environment and potential loss of habitat, this illustrates the conflict inherent in delivering the principles of sustainable development.

[vi] An increase in housing and consequent population increase is likely to lead to increased air pollution from vehicles and domestic energy use, however, sustainable design and construction of new development and/or improvements to existing dwellings may help to reduce air pollution.

[vii] Adaptations to the effects of climate change and measures to reduce contributions to climate change may harm the historic environment and will require sensitive design.

[viii] This policy is likely to lead to new development; this may help to address and adapt to climate change through the use of sustainable design and construction techniques, but if numbers of dwellings increase, it is likely to lead to increased contributions to climate change and increased water usage and flood risk overall.

[ix] Any new development potentially resulting from this objective must take into account the requirement to conserve water resources and prevent flooding.

[x] The local economy is likely to benefit from the attractive, historic local environment but conflict may arise due to requirements for new business development where this may impact upon the historic character of the borough.

[xi] Economic growth is likely to lead to development; this must be sensitively designed and sited to avoid impacting on water quality, water resources or flood risk.

[xii] The incorporation of noise mitigation measures could potentially be resisted, if physical works are required which could be considered unsympathetic in terms of the historic fabric of the building.

[xiii] Improvements in access to essential facilities could reduce the need to travel and therefore contribute to improvements in air quality.

[xiv] The incorporation of air quality mitigation measures could potentially be prevented, where these require physical work that may be considered unsympathetic in terms of the historic fabric of the building.

Appendix 3 – Refined SA Framework

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
1. Actively support inclusive access to essential health, community and local services.	Will services be provided to a broad section of the community, e.g. youth/elderly?	Community centres providing youth activities.	No data available	N/A
		Number of accessible libraries.	10 out of 11.	15
		Percentage of local authority buildings accessible by disabled people.	3.01%	15
	Will it improve the quality and integration of health services?	Number of health centres with 3 or more disciplines.	No data available	N/A
	Will it ensure that essential services are accessible to those without access to a car?	*Number of GP surgeries in the borough.*	84 (2005/06)	27
		Number of opticians in the borough.	30 (2005)	29
		Number of dental surgeries in the borough	58 (2005)	28
		Access to other key services – No indicator identified	N/A	63

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it improve the satisfaction of residents with their neighbourhood as a place to live?	Not identified - Survey of residents' satisfaction to be undertaken shortly.	No data available	N/A
2. Promote community involvement, voluntary and partnership working.	Will increase community participation in activities and the democratic process?	Percentage of people voting in Elections.	34.1% (May 2002)	69
		Percentage of adults surveyed (in 2002) who feel they can influence decisions in their local area a) individually b) by working together	a) 32% b) 64%	70
	Will it promote partnership working?	Not identified	No data available	N/A
3. Preserve and enhance the local historic environment and cultural heritage.	Will it protect/enhance the historic environment?	Number of Listed Buildings under each grade	2004: Grade I – 6 Grade II – 512 Grade II* - 17	119
		Number/percentage of listed buildings on the Buildings at Risk Register.	11 (2005)	101
		Number of conservation areas	29 (2005)	87
		Number of Scheduled Ancient Monuments	7 (2004)	120

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it protect the quality of designated historic landscapes and townscapes?	Number of Heritage Land/Registered Historic Garden Designations.	3 Heritage land designations in the UDP (total area: 0.65km2). 3 Gardens of Special Historic Interest (2005)	84
		Number of local and strategic viewpoints, views and landmarks in the borough.	19 viewpoints 7 views 13 landmarks (2005)	99
	Will it preserve and record archaeological features?	Number of archaeology priority areas.	8 in Acton 9 in Ealing 2 in Hanwell 7 in Northolt and Perivale 4 in Southall (2005)	100
		Number and percentage of archaeological sites at risk.	N/A	121
4. Reduce crime, fear of crime and antisocial behaviour.	Will it reduce actual levels of crime?	Overall crime rate (recorded crime BCS comparator).	78.3 (2005/06)	34
		Index of Multiple Deprivation 2004 by Super Output Area – Crime (Rank 1 = most deprived, 32,482 = least deprived.	Ealing 10,561 W. London 12,051 London 11,821 (2004)	37

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		Total notifiable offences (per 1000 households).	126	35
		Crime survey: burglary/burglary from dwelling (per 1000 households).	5.1	33
		Theft of/from motor vehicles (per 1000 households).	22.6	32
	Will it reduce the fear/perception of crime?	Perception/fear of crime – no indicator identified.	*N/A*	38
5. Minimise detrimental noise impacts.	Will ambient (environmental/industrial) noise levels be reduced? Will it reduce vehicular traffic noise? Will it reduce the impact of air traffic noise? Will it reduce perceived noise levels?	Number of noise complaints received by LBE Environmental Health Department for different categories of noise.	Aircraft - 3 Road -15 Rail - 0 Commercial noise -363 Alarms - 123 Domestic noise - 1477 Noise insulation –6 (2004-2005)	**82**
		Percentage of borough exposed to noise levels above 60dB(A) in the day.	17%	**81**
		Percentage of borough exposed to noise levels above 60dB(A) at night	4%	**81**

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it promote best practice in terms of noise minimisation and attenuation in design?	No indicator identified	N/A	N/A
	Will it promote the appropriate siting of development which minimises the potential for conflict with incompatible uses?	No indicator identified	N/A	N/A
6. Improve access to well designed, affordable, inclusive and appropriately located housing.	Will it improve the affordability of housing?	Number/percentage of housing completions which are affordable.	447 affordable homes completed (31% of total homes completed) (2007/08)	54
		Affordable Housing Ratio (house price/earnings affordability)(2006)	11.2 (2006)	55
	Will it improve the availability of housing?	Total number of housing completions	701 gross; 637 net (2005/06)	53
		Housing Tenure mix	No data available	N/A
		Time on housing waiting list	No data available	N/A
		Number of people sleeping rough on a single night.	5	59
		Percentage of Local Authority homes which were non-decent (BVPI)	38% (2005/06)	57

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		Unfit Homes per 1000 dwellings (AMR)	52 (2006)	56
	Will it improve the physical accessibility of housing?	Percentage of homes built which are Wheelchair Accessible.	Data not yet available. To be recorded as part of the Annual Monitoring Report. Target of 10%.	52
		Percentage of homes built which are built to Lifetime Home Standards.	Data not yet available. To be recorded as part of the Annual Monitoring Report. Target of 100%.	51
7. Reduce health inequalities and promote healthy living.	Will it reduce health inequalities? Will it reduce death rates?	Life expectancy	Male 77.7 Female 82.1 (2008)	21
		Standardised Mortality Rate	95 (2003) Below 100 indicates a lower death rate than the national average.	22
		Percentage of population in good health.	71.07% (2001)	20

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it improve access to health facilities?	*Number of GP surgeries*	84 (2005/06)	27
		Number of NHS dentists	58 (2005)	28
		Number of opticians	30 (2005)	29
	Will it improve healthy living?	Accessibility to sports/recreation facilities.	No data identified	N/A
8. Protect and enhance public open space	Will it protect open space?	Area of protected open space.	1701ha % of total area of the borough = 30.7% Comprises: 3 Heritage land sites (65.3 ha) 12 Green Corridors (418.6 ha) 7 Green Belt sites (332.3 ha) 12 Metropolitan Open Land sites (847.6 ha) 139 Pubic Open Spaces (557 ha) 85 Community Open Space (105.1 ha)	84

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		Gains or loss in open space (loss of designated open space to development) (AMR – Permissions and Completions data)	Completions – No applications completed which would result in loss of open space Permission – 2 applications (although only one permanent)	85
	Will it enhance the quality of open/green space?	Satisfaction with open space in the borough (Percentage of residents satisfied with the borough's open space) (BVPI)	56% (2007) Southall Park and Northala Fields awarded Green Flag status (2007/08)	83
9. Protect and enhance the natural environment and biodiversity	Will it conserve and enhance existing habitats of importance (notably designated sites)?	*Total area of Sites of Metropolitan or Local Importance for Nature Conservation (SMLINCs).*	75 sites Area: 503 ha	122
		The number/area of Local Nature Reserves.	6 LNRs covering 44.91 ha	138

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		Number/area of Local Nature management areas in the borough	7 (2005) Area: 704 ha	86
		Gains or loss of open space designated for its nature conservation value (AMR – Permissions and Completions data).	No change to areas designated for their nature conservation value	86
		Number/area and type of BAP Priority Species and Habitats.	See list for species and habitats – measurable indicator not identified	97 123
		The achievement of BAP targets	Indicator not identified	124

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will the biodiversity value of watercourses and their associated corridors be protected and enhanced?	*Percentage of main rivers and canals recorded as good or fair quality (This indicator relates to water quality and not biodiversity).* *The length of naturalised green buffer zones for wildlife next to watercourses created.* *The number of developments providing buffer zones along watercourses*	100%	94 125

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it create new habitats (therefore increasing biodiversitry)?	*The number or area of habitats created*	Data not yet identified	126
		The number of developments providing ecological enhancements		
10. Improve Air Quality	Will it improve air quality?	Extent of air quality management area(s)	Whole of the borough (2005)	80
	Will it help to achieve the objectives of the Air Quality Management Plan?	The number of days when air quality is moderate or high	24 days (2007/08)	80
	Will it reduce the need to travel by private car?	Method of travel to work and education	Data not yet identified	91
	Will it encourage freight transfer from road to rail and water?	Not identified	N/A	N/A
11. Reduce contributions to and vulnerability to climate change	Will it lead to an increase proportion of energy needs being met from renewables?	Proportion of energy supplied from renewable sources	No data available	76

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		The number of planning applications where equipment for renewable power generation has been secured (AMR).	3 major applications (South Acton Estate, Grange Primary School, Moorlands Care Home) were approved (2005/06)	77
	Will it encourage cleaner modes of transport?	Method of travel to work and education.	Data not yet identified	91
	Will it reduce greenhouse gas emissions?	CO_2 **emissions by end user.**	Data not yet identified	73
		CO_2 **emissions by sector.**	Data not yet identified	74
	Will it reduce energy demand?	Energy efficiency – the average SAP rating of local authority owned dwellings (BVPI)	68 (2005/06)	75
		The number of developments incorporating energy efficient techniques such as green roofs etc	Data not yet identified	127
12. Improve water quality, conserve water resources and minimise the impact of flooding.	Will it encourage sustainable water supply and consumption	Groundwater storage (Thames Water)	Average and above (March 2007)	136

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it reduce water consumption?	Surface reservoir storage (Thames Water) (Three Valleys Water)	Average (96% Thames Valley, 97% London as a whole) Normal range	137
		Water consumption per household.	UK figures only	88
		Water consumption in non-domestic developments.	Data not yet identified	128
		The overall water consumption in the borough per capita.	Data not yet identified	N/A
		The number of developments incorporating water conservation techniques.	Data not yet identified	129
	Will it reduce flood risk?	The number of planning applications granted which are contrary to the advice of the Environment Agency on either flood defence grounds or water quality	Zero (07/08)	95
		The number of properties or the area of developed land at risk from flooding	See SFRA	130

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		The number of planning applications incorporating sustainable urban drainage systems (SUDS). Or the number or percentage of new developments which have met the following criteria: a) Control the quantity of surface water runoff from new development (discharge rates restricted to Greenfield including 1 in 100 year on-site attenuation) b) Improve the quality of runoff c) Enhance nature conservation, landscape and amenity value of site.	No data available Example systems include conventional attenuation storage (tanks or excavated areas), permeable pavements, grassed swales, infiltration trenches, and ponds.	N/A
	Will it improve water quality in the borough?	Percentage of main rivers and canals recorded as good or fair quality in terms of (a) biological quality (b) chemical quality	(a) 100% (b) 100% (2003/04)	94
13. Enhance existing buildings and facilities, and encourage the	Will it ensure that new development occurs on derelict, vacant and	Percentage of new homes built on previously developed land (BVPI)	100 (2007/08)	78

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
reuse/remediation of vacant land and under-utilised buildings.	underused previously developed land?	Gains or loss in open space (loss of designated open space to development)(AMR 07/08)	Completions – No applications completed which would result in loss of open space Permission – 2 applications (although only one permanent)	85
	Will it encourage the reuse of vacant or underutilised buildings?	Vacancy Rates (EDS)	6.8% (December 03)	115
		Vacancy Rates of Major Employment Locations	175,108 sq. m. of industrial and warehouse premises are vacant representing 7.8% of total stock (2005)	114
		Vacancy rates of retail units within town centres (Ealing Town Centre Health Checks)	Acton –9% Ealing – 4% Greenford – 5% Hanwell – 22% Southall – 2% (2005) Northolt – 2% Park Royal – 8% (2004)	116

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it enhance soil quality/address contamination issues?	Percentage of new homes built on previously developed land (BVPI)	100% (2007/08)	78
14. Reduce waste generation and increase waste recycling.	Will it reduce overall household waste generation?	Number of kilograms of household waste collected per head (BV84)	385.5 (2007/08)	118
	Will it increase recycling levels?	Percentage of the total tonnage of waste arising, which have been recycled (Municipal only) (BV82) Household (Total Tonnage)	Total Tonnage: 22,139 15.32% (2005/06) 19,150 (2005/06)	71 72 133
	Will it reduce commercial and industrial waste?	Total waste arisings (non-municipal). Data not yet available.	Not yet identified	132
15. Reduce vehicular dependency and promote the use of sustainable modes of transport	Will it reduce the use of the private car? Will it increase the proportion of journeys being made by public transport?	Mode of travel used by Ealing residents to visit nearest town centres.	33% by car/van 25% by bus 22% on foot 2% by tube/train	64
		Car ownership levels - Households with access to 1 or more car(s)/van(s)	68.3% (2001)	93
	Will it generate investment for improvement in transport infrastructure?	Amount of Section 106 funding secured for transport improvements (AMR).	22 sealed agreements, securing over £3 million in planning benefits in 2005/06. 9.7% of this total was secured for transport works	134

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
16. Promote local employment opportunities, training and skills attainment.	Will it improve employment rates/reduce unemployment levels?	Unemployment rate (Census)	3.9% (2001) Note variations between wards	16
	Will it create local paid employment opportunities?	New Firms: Registrations – Enterprise: VAT registrations per 10,000 adults.	50 (2005)	103
		Percentage Annual Change in VAT registered stocks at year end	0.3 (2004)	135
	Will it promote local employment opportunities through new business establishment?	Inward investment (EDS)	A total of 25 companies originating from overseas are registered with Think London as having set up in Ealing from April 1995 to date (2005)	111
	Will it increase employment opportunities for all groups, including those most in need?	Unemployment rate – Ward level data (Census)	3.9% overall (2001) Note variations between wards	16
		Employment rate by ethnicity (EDS)	White – 83.5% Non White – 58%	46
	Will it improve earning levels?	Annual Earnings – Average Household Income (including benefits) (EDS)	£37,559 (Unequivalised) (2006)	47

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it improve skills attainment?	Skills Level: Percentage of working age population qualified to degree level or higher (EDS)	38% (2004)	43
17. Support Sustainable Economic growth.	Will it encourage new business start ups?	New Firms: Registrations – Enterprise: VAT registrations per 10,000 adults	50 (2005)	103
		Vacancy rate (EDS)	6.8% (December 2003)	115
	Will it encourage inward investment?	New Firms: Registrations – Enterprise: VAT registrations per 10,000 adults	50 (2005)	103
		Organisations which support new and established businesses	Business Link for London, West London Business Forum, Gateway Enterprise, Action Acton, Southall Regeneration Partnership, Park Royal Partnership	102
	Will it ensure that there is a sufficient supply of employment/industrial space?	Distribution of Industrial/Warehousing floorspace in West London (EDS)	Total of 2,237 sq. m. of factory and warehouse floorspace.	112

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		Change in employment floorspace – Permissions and Completions data (AMR)	2005/06 – Permissions: Net gain of 22,500 sq. m. of B!, B2 and B8 Completions: 19,816 sq. m. of employment floorspace completed (60% for B8;26% B1). All development took place on previously developed land; 99% on sites designated for employment use in the UDP, 33% in regeneration areas 2.4ha of land lost from employment use (B1, B2, B8)	113
		Vacancy rate of Major Employment Locations (EDS)	175,108 sq. m. of industrial and warehousing premises are vacant representing 7.8% of total stock (2005)	114

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it support the formation of local supply chains for goods and services?	Organisations which support new and established businesses	Business Link for London, West London Business Forum, Gateway Enterprise, Action Acton, Southall Regeneration Partnership, Park Royal Partnership	102
18. Improve opportunities for education and training	Will it improve the qualifications and skills of the population	Literacy and numeracy of 11 year olds (Neighbourhood Renewal Project)	78%	41
		Literacy and numeracy of 14 year olds (Neighbourhood Renewal Project)	73%	42
		Educational Attainment - % of 15 year old pupils in school maintained by the local authority achieving 5 or more GCSE's at grades A*-C or equivalent (BVPI)	59.4% (2004/05)	39
		Educational Attainment - % of 19 year olds with 2 qualifications and above (EDS)	73.8% of 18-19 year olds	40
		Skills Level: % of working age population qualified to degree level or higher (EDS)	38%	43
		Number of pupils with English as an additional language (DFES)	41.8% (1997)	44

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
	Will it improve access to educational facilities?	Number of educational institutions in the borough	10 Children's centres, 64 primary Schools (56 of which have nurseries) 12 Secondary Schools, 1 Academy, 22 independent schools, 2 pupil referral units and 6 Schools for pupils with special educational needs	45
19. Promote cultural and community identity	Will it foster a sense of pride in the area?	Percentage of people surveyed who think that their local area is a place where people from different backgrounds can live together harmoniously.	71%	66
	Will it encourage engagement in community activities?	Membership (numbers (2002)) of the main community networks (Ealing Community Network, BME forum and Refugee Forum.	ECN – 230 BME Forum – no data Refugee Forum – 7 (2002)	67

Proposed LDF SA Objective	Criteria	Indicator	Measurable baseline data	Baseline table reference
		Number of people (2002) volunteering through the volunteer bureau	257 (2002)	68

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

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