

London Borough of Ealing's Local Implementation Plan (LIP) for Transport

Strategic Environmental Assessment (SEA) Post Adoption Statement

Providing information required under Regulation 16.4 of the Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633



July 2011

Collingwood Environmental
Planning Limited

1E, The Chandlery
50 Westminster Bridge Road
London

SE1 7QY

Tel: +44 (0)20 7407 8700

Fax: +44 (0)20 7928 6950

email: r.eales@cep.co.uk

www.cep.co.uk



Copyright and disclaimer

Copyright © Collingwood Environmental Planning Limited 2011. All rights reserved.

This report is intended solely for the use of Collingwood Environmental Planning's client for whom it was prepared. Any views or opinions expressed are solely those of Collingwood Environmental Planning and do not necessarily represent those of our client. No person other than the client may copy (in whole or in part), use or rely on the contents of this document, without the prior written permission of Collingwood Environmental Planning Limited.

Collingwood Environmental Planning has taken all reasonable care to ensure that the information contained in this report is accurate. However, no warranty or representation is given that the information contained within it is complete or free from errors or inaccuracies. Any opinions in this report are based on the professional judgment of the consultants taking into account the scope of the work which they were commissioned to do. The contents of this report should not be considered to constitute a legal opinion.

To the extent permitted by applicable laws, Collingwood Environmental Planning Limited accepts no liability for any loss or damages or expenses of any kind including without limitation compensatory, direct, indirect or consequential damages, loss of income or profit, or claims by third parties howsoever arising in connection with use of this report.

Photograph credits

Front cover:

Copyright © Collingwood Environmental Planning Limited 2010.

CONTENTS

1. INTRODUCTION AND BACKGROUND	1
Introduction	1
Background.....	1
Structure of the ‘Post Adoption Statement’ and regulatory requirements	4
2. HOW ENVIRONMENTAL CONSIDERATIONS AND THE ENVIRONMENTAL REPORT HAVE BEEN TAKEN INTO ACCOUNT	5
SEA process and the Environment Report.....	5
Non SEA processes and strategic context	6
3. HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT	9
Taking account opinions expressed during consultation and engagement.....	9
4. REASONS FOR CHOOSING THE LIP AS ADOPTED	11
Alternatives considered within the SEA	11
Reasons for choosing the preferred LIP	12
5. MONITORING SIGNIFICANT ENVIRONMENTAL EFFECTS	14
Proposals for monitoring	14

APPENDICES

Appendix 1 : SEA recommendations and LB Ealing responses	20
Appendix 2 : TFL comments and LB Ealing responses.....	28
Appendix 3 : Public consultation events	31
Appendix 4 : Public consultation correspondence	35

TABLES

Table 1 : LIP milestones, SEA process and main SEA outputs.....	3
Table 2 : Key changes to the LIP as a result of the SEA process and Environment Report.....	6
Table 3 : Mayor’s Transport Strategy goals and challenges.....	7
Table 4 : LIP performance monitoring.....	14
Table 5 : Monitoring of significant environmental effects of implementing the LIP.....	16
Table 6 : Potential gaps in monitoring significant environmental effects	17

ABBREVIATIONS

AMR	Annual Monitoring Report	LIP	Local Implementation Plan
AQMA	Air Quality Management Area	LTP	Local Transport Plan
CEP	Collingwood Environmental Planning	MTS	Mayor's Transport Strategy
CLG	Department for Communities and Local Government	NO ₂	Nitrogen dioxide
CO ₂	Carbon Dioxide	NO _x	Nitrogen oxide
DfT	Department for Transport	PCT	Primary Care Trust
GHG	Greenhouse Gas	PM _{2.5}	Particles measuring less than 2.5 microns
GLA	Greater London Authority	PM ₁₀	Particles measuring less than 10 microns
KSI	Killed or Seriously Injured	SEA	Strategic Environmental Assessment
LAQM	Local Air Quality Management	SO ₂	Sulphur dioxide
LB Brent	London Borough of Brent	S RTP	Sub Regional Transport Plan
LB Ealing	London Borough of Ealing	TAG	Transport Analysis Guidance
LDA	London Development Agency	TfL	Transport for London
LDF	Local Development Framework	UK	United Kingdom
LDS	Local Development Scheme		

1. INTRODUCTION AND BACKGROUND

Introduction

- 1.1 This document provides the information required under Regulation 16.4 of the Environmental Assessment of Plans and Programmes and Regulations¹ Part 4: Post-Adoption Procedures, and is being referred to as the Strategic Environmental Assessment (SEA) of the London Borough of Ealing's second Local Implementation Plan (LIP) for Transport Post Adoption Statement (henceforth "the Post Adoption Statement"). The Post Adoption Statement is related to and should be read alongside: the SEA Environment Report and Non-Technical Summary, the SEA Scoping Report, and the Final LIP. All of these documents are available from the London Borough of Ealing (LB Ealing) website². Hardcopies of these documents are available on request from:

Post: Nick O'Donnell, Assistant Director of Strategic Transport,
London Borough of Ealing
Ealing Council
Perceval House
14/16 Uxbridge Road
Ealing W5 2HL

Email: ODonnellN@ealing.gov.uk

Background

The Local Implementation Plan for Transport in London Borough Ealing

- 1.2 The LIP provides the strategic framework for transport planning in Ealing over the next 20 years, initially focusing on delivery over the period to 2013-14. The LIP aims to help implement the Mayor's Transport Strategy (MTS), and takes the MTS goals, challenges, policies and outcomes and tailors them to the Ealing context. The LIP contains eight objectives which cover road safety, sustainable travel and key links, smoothing the traffic flow/improving journey time reliability, improving quality of life, promoting healthy travel behaviour, improving access for all, improving the condition of principal roads and reducing the contribution of CO₂ and improving resilience to climate change.. The LIP will be delivered in conjunction with stakeholders and partners, particularly Transport for London (TfL), but also other transport and local stakeholders, residents and businesses.
- 1.3 Work on the second Ealing LIP commenced in early 2010. In October 2010 a public meeting was held on transport to provide an opportunity for public engagement in and input to the LIP development process. Formal statutory and non-statutory (including public) consultation on the draft LIP was held between 20 December 2010 and 31 March 2011. This consultation also included formal review by TfL, and detailed comments were provided to LB Ealing on the draft LIP. During this time a number of public meetings were also held in locations around LB Ealing. Between March and April 2011 LB Ealing amended the LIP in response to consultation comments and recommendations, and in June 2011 the LB Ealing Cabinet approved the LIP for adoption. Following approval by the LB Ealing Cabinet the final LIP was submitted to TfL prior to formal adoption on 22 June 2011.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004, no.1633

² LB Ealing website LIP pages: http://www2.ealing.gov.uk/services/transport_and_streets/transport_strategy_and_policies/Lip/

Strategic Environmental Assessment of the LIP

- 1.4 The purpose of SEA is to facilitate better integration of environmental considerations into plans and programmes and promote sustainable development. The process of conducting the assessment is therefore to seek to ensure that the plan, in this case the LIP, considers the potential implications on the environment during its preparation and responds as appropriate.
- 1.5 SEA is required for certain plans and programmes to fulfil the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans on the environment (known as the Strategic Environmental Assessment or SEA Directive), as transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations 2004. The guidance produced by the Greater London Authority (GLA) and TfL to assist boroughs in developing their second LIPs³ states that '*TfL is of the view that a formal revision of a borough's LIP is likely to be subject to mandatory assessment under the Regulations⁴ and will involve the preparation of an environmental report, to be available during the public consultation on the proposed LIP*'. Following this guidance, in May 2010 LB Ealing commissioned Collingwood Environmental Planning Limited (CEP) to carry out a SEA of the emerging second LIP. The assessment was undertaken between May and December 2010. The results of the assessment were made available in the SEA Environmental Report of the draft LIP (December 2010) (the Environmental Report) and published alongside the consultation draft LIP (as made available for consultation on 20 December 2010).

SEA programme and outputs

- 1.6 The approach used for the assessment followed Government SEA guidance⁵ and adapted it to suit the particular situation of the Ealing draft LIP. Table 1 provides an overview of how the SEA process was conducted alongside the LIP process and the timings of both. This illustrates the iterative approach the SEA adopted during the development of the plan. The SEA of the evolving LIP was undertaken by CEP independently from the LB Ealing, whilst liaising closely with those preparing the LIP.
- 1.7 Meetings were held regularly between the SEA team and LB Ealing officers. Written commentaries which included key findings and recommendations from the assessment were provided by CEP at key stages to help inform the development of the LIP. Comments provided during this process focussed on, for example, the emerging LIP objectives, alternative approaches to meeting the LIP objectives, LIP indicators and early draft versions of the LIP itself.

³ GLA (2010) Guidance on Developing the Second Local Implementation Plans

⁴ The Environmental Assessment of Plans and Programmes Regulations 2004

⁵ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive. Other SEA guidance is also available and has also been drawn on, for example: *SEA for Transport Plans and Programmes – TAG Unit 2.11 'In draft' Guidance* (DfT, April 2009⁵).

Table 1: LIP milestones, SEA process and main SEA outputs

LIP milestones	Key dates	SEA process	SEA outputs	Purpose of SEA outputs
Mayor published the revised MTS and the GLA produced final Second LIP Guidance	May 2010	The MTS provides the high level strategic framework for the second LIP. The GLA guidance sets out how LB Ealing should develop its second LIP and also refers to the SEA.	-	-
Ealing commenced second LIP preparation in detail	Early - mid 2010	The SEA scoping stage supported and was developed iteratively with the initial work on the second LIP Consultation on the SEA Scoping Report ran for five weeks during July and August 2010.	SEA Scoping Report	To consult the statutory consultees and other stakeholders on the proposed approach and level of detail of the SEA and the proposed contents of the Environmental Report, as well as to identify the key environmental issues and context.
Ealing submitted Annual Funding submission to TfL for 2011/12	8 October 2010	Ongoing assessment of the draft LIP and its alternatives. Preparation of the Environmental Report.	Various input through meetings and commentaries.	The SEA team provided comments on early versions of elements of the LIP to inform its development.
Completion of draft second LIP	November 2010	The iterative nature of the SEA process meant Stages B and C of the SEA were progressed alongside the development of the LIP.	SEA Commentary Nov 2010	
LB Ealing Cabinet consider draft LIP and initial SEA findings	November 2010		Details the Ealing LIP SEA included in Cabinet Paper.	To inform Ealing's Cabinet about the SEA.
Ealing submitted consultation draft second LIP and SEA to TfL for consideration	20 December 2010	The Environmental Report submitted to TfL alongside the draft second LIP.	Environmental Report	To record the findings of the assessment, including how this has informed the LIP, and inform the consultation on the draft LIP.
Public consultation on the draft second LIP and Environmental Report	December 2010 - March 2011	Ongoing consultation on the Environmental Report alongside the draft LIP.	-	-
TfL responded to Ealing, setting out where changes are needed.	February / March 2011	The changes were considered as part of the SEA process and any changes to the LIP considered to be significant assessed with the findings presented in this addendum.	Addendum to the Environmental Report	To ensure the assessment considers the environmental effects of any significant amendments to the LIP.
Ealing amended the draft LIP to reflect TfL and comments from public consultation.	April – June 2011			
Submission of final Second LIP and Mayoral approval and adoption of second LIP	June 2011 onwards	The Environmental Assessment Regulations require the responsible authority to publish at the adoption stage certain information on the plan and how environmental considerations and consultation opinions were accounted for.	SEA Post Adoption Statement (this report)	To indicate how the final LIP addressed environmental considerations, how it addressed the responses raised by the consultation process and present final details of SEA monitoring process.
Implementation of the LIP	Ongoing	Ongoing SEA monitoring. This is likely to be incorporated into the monitoring of the implementation of the LIP.	Monitoring results	To monitor the significant environmental effects of implementing the LIP.

Structure of the 'Post Adoption Statement' and regulatory requirements

1.8 As noted in paragraph 1.1, Regulation 16.4 of the Environmental Assessment of Plans and Programmes and Regulations⁶ requires certain information to be made available following adoption of the plan (in this case the LB Ealing LIP). For convenience all of this information has been collated within this Post Adoption Statement, which together with the Environmental Report (December 2010) and the final LIP, meets the requirements as set out in Regulation 16.4. To comply with these requirements the remainder of this Post Adoption Statement sets out the following information:

Section 2:

- How environmental considerations have been integrated into the LIP: Regulation 16.4(a);
- How the Environmental Report has been taken into account: Regulation 16.4(b);

Section 3:

- How opinions expressed via consultation have been taken into account within the LIP as adopted: Regulation 16.4(c)⁷;

Section 4:

- The reasons for choosing the LIP as adopted in the light of the other reasonable alternatives considered: Regulation 16.4(e); and,

Section 5:

- The measures to be taken to monitor the significant environmental effects of the implementation of the LIP: Regulation 16.4(f).

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004, no.1633

⁷ Note, regulation 16.4(d) requires "the results of any consultations entered into under regulation 14.4 have been taken into account". No consultations were undertaken in relation to regulation 14.4, which refers to transboundary consultations (due to significant environmental effects in other EU Member States from), as no transboundary effects were predicted.

2. HOW ENVIRONMENTAL CONSIDERATIONS AND THE ENVIRONMENTAL REPORT HAVE BEEN TAKEN INTO ACCOUNT

This section includes information as required under Regulation 14.4(a) and 14.4(b). Paragraphs 2.3 – 2.5 and Table 2 describe out how the Environmental Report has been taken into account (14.4(b)). Paragraphs 2.6 – 2.10 and Table 3 set out how broader environmental considerations have been integrated into the LIP (14.4(a)).

Introduction

- 2.1 Environmental considerations have been integrated into the LIP through two processes:
- The SEA process and its influence on the LIP, in particular the assessment and recommendations made in the Environmental Report; and,
 - Other, non-SEA processes and strategic context to the LIP, for example the need to implement the MTS goals and objectives in Ealing (which include environmental objectives, such as reducing transport related CO₂ emissions) and consultation on the draft LIP itself which included environmental responses.
- 2.2 The sub-sections below set out separately these two key sources of influence on the input of environmental considerations into the LIP.

SEA process and the Environment Report

- 2.3 The different stages of and outputs from the SEA process have run alongside and influenced emerging drafts of the LIP (as set out in Table 1). The key outputs and influencing points from this process include:
- SEA Scoping Report, including consultation in July 2010;
 - Two SEA commentaries setting out specific comments and recommendations in November and December 2010;
 - The SEA Environment Report (December 2010); and,
 - Ongoing dialogue and correspondence between the SEA team and those in LB Ealing responsible for drafting the LIP including a number of meetings.
- 2.4 The key changes to the LIP resulting from the SEA and the Environment Report are listed in Table 2. For a more complete record of the comments and recommendations made throughout this process, as well as LB Ealing responses see Appendix 1 of this document.
- 2.5 The Environment Report, and SEA recommendations more broadly (provided through meetings held between the SEA team and LB Ealing, and the two SEA commentaries) have been taken into account through specific changes being made to the evolving versions of the draft LIP, including changes to the objectives, evidence base, transport issues and opportunities as well as the packages of measures included in the Delivery Plan. Not all recommendations made by the SEA and included in the Environmental Report were incorporated in the LIP, and where this is the case the reasons for this has been summarised in Appendix 1.

Table 2: Key changes to the LIP as a result of the SEA process and Environment Report

Element of draft LIP	Key changes resulting from the SEA process and Environment Report
Evidence base and LIP opportunities	<ul style="list-style-type: none"> • Introduction of 'opportunities' sub heading and bullet points within the draft LIP evidence base, setting out where the LIP can respond to issues identified. • Modification of text describing the number of walkable and cyclable trips such that it represents an opportunity to increase the share of walking and cycling in the borough. An additional opportunity was added to the evidence base to reflect this. • Amendment to evidence base to emphasise the importance of modal shift away from private car use. Additional opportunity added to the evidence base to reflect this. • Clarification of text in the evidence base relating to the impacts of climate change on transport and transport infrastructure in Ealing and the importance of climate change adaptation, as well as mitigation. Amendment of sub-heading and opportunities to reflect clarified text. • Additional opportunity added to evidence base to emphasise the importance of providing sufficient walking, cycling and public transport infrastructure for new development proposed in the borough. • Inclusion of text emphasising the value of street trees and inclusion of additional opportunity in the evidence base. Amendment to Delivery Plan text to reflect this.
Objectives	<ul style="list-style-type: none"> • Changes of wording of Objective 1 to emphasise the importance of safety improvements for pedestrians, cyclists and motorcyclists. • Addition of a footnote to Objective 2 to define 'sustainable travel'. • Changes to wording of Objective 3 to emphasise the importance of journey time reliability for bus passengers, cyclists and pedestrians. • Changes to wording of Objective 4 to include text seeking the protection and enhancement of the urban and natural environment. • Addition of reference to neighbourhood centres in Objective 6. • Changes to Objective 7 to emphasise benefits to all road users. • Changes to Objective 8 to expand focus from resilience to extreme weather events to the need for climate change resilience.
LIP Delivery Plan	<ul style="list-style-type: none"> • Additional table included to provide examples of the implementation of LIP measures (TfL also requested this be included). • Amendment of Delivery Plan text to emphasise the importance of increasing travel choices.
Targets and monitoring	<ul style="list-style-type: none"> • Inclusion of a more ambitious target for car club parking bays. • Inclusion of an indicator to measure the installation of cycle parking bays (this change also responded to an MTS High Level Output requirement).

Non SEA processes and strategic context

2.6 At the highest level the LIP is seeking to deliver, within Ealing, the Mayor's goals and objectives for transport in London set out in the MTS. As a result the MTS sets the overarching framework of priorities within which the LIP should operate. Table 3 summarises the MTS goals and challenges, highlighting **in bold** those that are seeking explicitly environmental outcomes. These goals and challenges set the high-level strategic context for the LIP and informed the development of the LIP objectives. The MTS, and a number of the goals and challenges it prioritises can therefore be viewed as a direct input of environmental considerations into the LIP.

Table 3: Mayor's Transport Strategy goals and challenges

Goals	Challenges
Support economic development and population growth	Supporting population and employment growth
	Improving transport connectivity
	Delivering an efficient and effective transport system for people and goods
Enhancing the quality of life for all Londoners	Enhancing the built and natural environment
	Improving air quality
	Improving noise impacts
	Improving health impacts
Improving the safety and security of all Londoners	Reducing crime, fear of crime and anti-social behaviour
	Improving road safety / public transport safety
Improve transport opportunities for all Londoners	Improving accessibility
	Supporting regeneration and tackling deprivation
Reducing transport's contribution to climate change and improving its resilience	Reducing CO₂ emissions
	Adapting to climate change
Support the delivery of the London 2012 Olympic and Paralympic Games and its legacy ⁸	Contributing to a successful Games and its legacy

2.7 The LIP is also consistent with the West London Sub-Regional Transport Plan (SRTP), developed by a partnership of six west London local authorities: Brent; Ealing; Hammersmith and Fulham; Harrow; Hillingdon; and Hounslow; as well as West London Business, British Airports Authority (BAA) and other stakeholders in the West London Alliance. One of the key challenges and priorities of the SRTP is improving air quality.

2.8 Beyond transport related strategic context there are a number of other policy documents which encouraged or required the inclusion of environmental (and other) considerations within the LIP⁹:

- The Ealing Sustainability Strategy 2011¹⁰ provides an action plan and a number of objectives and targets for areas such as carbon, waste, health and sustainable transport.
- The Sustainable Community Strategy 2006 – 2016¹¹ represents a multi-agency strategy for the development of LB Ealing. It includes 'health', 'safety' and 'high quality of life' within its priorities.
- Ealing's Local Development Framework¹² also describes specific environmental considerations that have been referred to within the LIP. These include:
 - Outside the [transport] corridors, protect and enhance suburban communities and improve public transport links to corridors';
 - Care for the Borough's historic character and ensure excellence in urban design; and,

⁸ London boroughs are not however required to set out local level priorities or actions in support of the Olympic related goal.

⁹ These documents are included in the Policy Context chapter of the LIP

¹⁰ LB Ealing (2011) Ealing Sustainability Strategy

¹¹ Ealing Sustainable Community Strategy 2006 – 2016:

http://www2.ealing.gov.uk/ealing3/export/sites/ealingweb/services/council/corporate_plan/docs/community_strategy.pdf

¹² Ealing's Local Development Framework:

http://www2.ealing.gov.uk/services/environment/planning/planning_policy/local_development_framework/

- Protect the pattern of green spaces and green corridors, while ensuring that developments improve and add to green space.
- 2.9 In addition to the environmental considerations raised by these policy documents the consultation process on the draft LIP also raised a number of environmental issues that were noted by LB Ealing and acted upon as appropriate – see Section 3 and Appendix 3 and Appendix 4 for a description of consultation comments and LB Ealing’s responses.
- 2.10 This strategic context was a key influence on the structure and strategic content of the LIP as well as the detail of implementation reflected in the LIP Delivery Plan, which was developed with consideration of and reflecting the environmental goals, objectives and priorities set at local, sub-regional and London levels. The inclusion by the LIP authors of this strategic context thus provided significant input of environmental considerations into the LIP.

3. HOW OPINIONS EXPRESSED DURING CONSULTATION HAVE BEEN TAKEN INTO ACCOUNT

This section sets out the information as required under Regulation 14.4(c) relating to how the opinions expressed via consultation have been taken into account within the LIP as adopted. This Section describes the various stages and types of consultation and engagement undertaken during development of the LIP and the SEA process, and briefly sets out how the opinions expressed were taken into account. Appendices 2, 3 and 4 provide more detail on how specific opinions and comments were incorporated in the LIP.

Taking account opinions expressed during consultation and engagement

Consultation and engagement activities

3.1 Stakeholder involvement enables those potentially affected by, or with a professional or personal interest in, the effects of the plan in question to engage with and input to the SEA and LIP processes. Various consultation and engagement activities were undertaken during the development of the LIP and through the SEA process, including:

LIP consultation:

- Public consultation as part of a public meeting: A New Transport Plan for Ealing (5 October 2010), this meeting focussed primarily on the priorities, scope and contents of the draft LIP;
- Consideration by the LB Ealing cabinet (November 2010), and formal cabinet approval of the draft LIP (June 2011);
- Formal public consultation and consultation with wider stakeholders both local and regional (December 2010 – March 2011);
- As part of the above formal consultation, LB Ealing organised public meetings in each of the five town centres in the borough (Acton, Ealing, Greenford, Hanwell, Southall) (February 2011); and
- Formal review and commentary by TfL (December 2010 – March 2011).

SEA consultation:

- Formal consultation on the Scoping Report (July – August 2010). In line with statutory requirements, the Scoping Report was made available for five weeks of consultation. A copy was sent to the three statutory bodies (Environment Agency, Natural England and English Heritage) along with a number of local stakeholders. A full list of those consulted at the scoping stage and a summary of comments received (and actions taken in response to these comments) is included in Appendix 2 of the Environment Report;
- Meetings with LB Ealing officers. Informal meetings have been held throughout the assessment of the draft LIP;
- Informal consultation within LB Ealing (June – December 2010) on the SEA commentaries provided during the preparation of the draft LIP;

- Public Correspondence in response to formal consultation on the Environmental Report for the draft LIP (December 2010 - March 2011). Consultation on the Environmental Report was undertaken in accordance with Regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004 No. 1633.¹³.

How opinions expressed were taken into account

- 3.2 Appendices 2, 3 and 4 provide summaries of all consultation comments received and include the responses to these comments and a summary of changes made to the LIP, as recorded by LB Ealing during the process. The comments received and opinions expressed can be considered to fall into three broad categories:
- Requests or recommendations for the inclusion of, or greater emphasis on particular transport related issues, such as accessibility for those with mobility needs;
 - Clarifications or corrections to evidence (e.g. data) and transport issues and opportunities in Ealing; and,
 - Changes to LIP targets and indicators, to reflect, for example newly collated data or modified external objectives and targets.
- 3.3 **Appendix 2** sets out all comments and recommendations made by TfL during their formal review of the draft LIP. These were taken into account (as necessary) through LB Ealing making specific changes to the LIP text, for example modifying the wording of objectives and including revised targets in the Delivery Plan.
- 3.4 **Appendix 3** summarises opinions expressed during public consultation meetings and events organised by LB Ealing to enable people to comment on and input to the draft LIP. LB Ealing considered all comments and opinions raised, and where relevant or appropriate to do so edited the draft LIP text to reflect comments made.
- 3.5 **Appendix 4** provides a list of comments made during the formal, online consultation on the LIP, which provided a means for any interested individual or organisation to comment on any aspect of the LIP contents or process. As with the results of the consultation events, LB Ealing considered all comments and opinions raised, and where relevant or appropriate to do so edited the draft LIP text to reflect comments made. Initially consultation comments received were categorised using the following criteria: “Include suggestion”; “possibly include suggestion”; or “do not include suggestion”. The reason for the latter two categories were primarily that many comments were considered to be outside the explicit scope of the LIP, and therefore not possible or appropriate for the LIP to address. In these cases LB Ealing indicated, where appropriate, that these were to be passed to relevant persons such as project managers or those working on other related plans or programmes.

¹³ http://www2.ealing.gov.uk/services/transport_and_streets/transport_strategy_and_policies/Lip/

4. REASONS FOR CHOOSING THE LIP AS ADOPTED

This section describes the reasons for choosing the LIP as adopted, in the light of other reasonable alternatives considered, and meets the requirements of Regulation 16.3(e). It sets out the main alternatives considered and describes the reasons why the LIP as adopted was taken forward.

Alternatives considered within the SEA

- 4.1 The development and assessment of alternatives provides an opportunity to compare the environmental implications of different approaches of achieving a plan's objectives, as well as testing how the different alternatives (in this case the draft LIP as proposed by LB Ealing and a possible strategic alternative to the LIP proposed by the SEA) might differ in their implementation in environmental terms. It should be noted that the preferred alternative may not necessarily be the 'best' in environmental terms, as the LIP is also seeking to achieve a number of other non-environmental objectives related to transport planning in Ealing.

Constraints and scope

- 4.2 As noted in Section 2, the main context for and constraints to the development of strategic alternatives to the LIP are the goals and objectives set out in the MTS, and the West London Sub-Regional Transport Plan:

- LIPs are required to reflect the goals, challenges and outcomes of the MTS, and as such the LIP needs to be in general conformity with and demonstrate how it will help deliver against the MTS goals and high-level outcomes.
- The LIP is required to conform with the West London Sub-Regional Transport Plan which sets the sub-regional context and priorities for transport planning in west London.

- 4.3 Whilst these higher level documents to some extent limit the scope for strategic alternatives, boroughs do have some scope for adopting alternative approaches in developing their LIPs. It is possible, for example, for some annual spending within a LIP to be realigned between the different LIP programmes: up to 20 per cent of funding can be moved between programme areas in any one funding period (three years)¹⁴. Equally the LIP's Delivery Plan of measures will be reviewed and updated every three years, and there is thus considerable scope for the strategic direction of the LIP to change over the lifetime of the plan.

Main strategic alternatives considered

- 4.4 The approach to the development of alternatives reflected the constraints identified above. Initially two potential alternatives to the draft LIP were proposed: a 'LIP-plus' alternative; and an 'aspirational LIP' alternative. Following discussions with LB Ealing, the 'aspirational LIP' alternative was not taken forward as it was considered to be too ambitious in the context of Ealing's wider objectives and budgetary constraints and therefore did not represent a reasonable alternative.
- 4.5 As the 'aspirational LIP' was not taken forward, one strategic alternative was therefore explored in detail, in addition to consideration of the **draft LIP as a strategic framework** for transport planning in Ealing:

¹⁴ Greater London authority (2010) Guidance on Developing the Second Local Implementation Plans. See para. 3.69.

- A '**LIP-plus**' strategic alternative, which envisages a LIP which sets a strategic transport planning framework focused on facilitating a more significant modal shift away from the private car by including and encouraging stronger measures (particularly in future Delivery Plans) to promote more sustainable modes and manage travel demand.
- 4.6 The 'LIP-plus' alternative was predicted to have broadly similar effects as the draft LIP, although the assessment concluded some positive environmental effects predicted under the draft LIP would be expected to be more certain under the 'LIP-plus alternative', largely due to the assumption that the 'LIP-plus' would seek in the long-term (e.g. through future Delivery Plans) to seek significant changes in travel behaviour through a strong and coordinated approach to managing travel demand (and eventually a reduction in road-space for cars) together with wide-ranging interventions to improve facilities for cycling and walking, as well as public transport.
- 4.7 For the reasons set out below, the 'LIP-plus' was not considered appropriate to be taken forward at the present time, however the development and assessment of strategic alternatives was instrumental in identifying possible mitigation and enhancement recommendations which have been included in the assessment of the measures included in the draft LIP Delivery Plan 2011-2014, and in particular the consideration of what priority measures might be included in future Delivery Plans to enhance the potential positive environmental effects of implementing the draft LIP and mitigate for the potential negative effects.

Alternative approaches to delivering the LIP

- 4.8 As noted above through the consideration and assessment of strategic alternatives, the SEA also identified and proposed alternative measures and approaches to delivering the current (and potential future) LIP Delivery Plan. Many of these 'alternatives' were presented as mitigation or enhancement measures by the SEA, including in the Environmental Report, and in some cases led to LB Ealing modifying aspects of the LIP, such as the wording of measures in the Delivery Plan, or the identification of additional transport opportunities and issues in Ealing. For more information on mitigation and enhancement recommendations made by the SEA, refer to Section 6 and Appendix 5 of the Environmental Report.

Reasons for choosing the preferred LIP

- 4.9 LB Ealing was responsible for developing and choosing the LIP as adopted with support from the SEA process. The final LIP as approved for adoption by the LB Ealing cabinet, was developed and agreed upon based on consideration of a number of objectives, including but not limited to environmental objectives. Factors influencing the choice of the final preferred version of the LIP included:
- the need to meet the requirements of other, relevant transport plans and strategies, in particular the MTS and the west London Sub-Regional Transport Plan;
 - LB Ealing, sub-regional and London level non-transport plans and objectives such as those included the emerging Local Development Framework and the draft London Plan;
 - budgetary constraints on the delivery of the LIP as a whole and the need to balance costs across the LIP considering its breadth of objectives;

- the fact that many of the packages of measures and schemes within the second LIP were originally funded under the previous LIP and were therefore being carried over rather than newly proposed;
- The local strategic context for the LIP including political preferences of the council Executive and the strategic direction for transport in Ealing outlined in the Ealing Transport Strategy published in 2009¹⁵ as a pre-cursor to the second LIP;
- the consultation responses, including those from TfL; and,
- the recommendations and advice presented via the SEA and Environment Report.

4.10 The selection of the preferred alternative therefore reflected the need to balance environmental objectives with other objectives, targets and priorities as well as budgetary constraints and that this is the second Ealing LIP and many of the measures and actions it proposes are a continuation of processes already underway.

¹⁵ LB Ealing (2009) Ealing Borough Transport Strategy:
http://www2.ealing.gov.uk/services/transport_and_streets/transport_strategy_and_policies/transport_strategy/

5. MONITORING SIGNIFICANT ENVIRONMENTAL EFFECTS

This section describes measures proposed to monitor the significant environmental effects of the implementation of the LIP, as required under Regulation 16.4(f).

Proposals for monitoring

- 5.1 Monitoring the significant environmental effects of implementing the LIP is a fundamental part of the SEA process. It is important to monitor performance against the SEA objectives, which form a core part of this assessment, and identify where they are being achieved and where they are not, so that appropriate remedial action can be taken and negative environmental effects addressed.
- 5.2 In addition, TfL requires London borough's to prepare a Performance Monitoring Plan for the LIP identifying a set of indicators and locally specific targets which can be used to assess whether the LIP is delivering its objectives and the outcomes set out in the MTS at the local level¹⁶. The first Ealing LIP (2007) included Performance Measures; however these have been reviewed and amended in response to changes in the LIP monitoring process proposed by TfL.

Monitoring proposed in the LIP

- 5.3 The LIP Performance Monitoring includes two categories of indicators and targets for monitoring purposes: core targets, locally specific targets for the MTS strategic indicators; and, local targets, additional local targets covering outcomes that are a priority in Ealing. These targets and indicators are set out in Table 4, and cover the monitoring of both environmental and non-environmental issues. To facilitate cross referencing, the indicators have been numbered: LIP1, LIP2 etc. Of these LIP Performance Monitoring indicators a large proportion are measuring environmental aspects of the LIP implementation, such as walking and cycling mode share, CO₂ emissions and air quality.
- 5.4 The following sub-section sets out the monitoring of significant environmental effects of implementing the LIP predicted by the SEA, as well as discussing gaps in monitoring of environmental effects and priorities for future revisions to monitoring arrangements.

Table 4: LIP performance monitoring

ID	Target title / indicator	Short-term target	Long-term target	Data source
Core targets				
LIP1	Walking mode share	27.7% walking mode share by 2013/14	29% by 2030/31	London Travel Demand Survey (TfL)
LIP2	Cycling mode share	2% cycling mode share by 2013/14	5% cycling mode share by 2025/26	London Travel Demand Survey (TfL)
LIP3	Bus service reliability Excess wait time (EWT) in minutes for all high frequency services running through the Borough	1.1 minutes by 2013/14	1.1 minutes by 2017/18	iBus

¹⁶ TfL and GLA (2010) Guidance on Developing the Second Local Implementation Plans

ID	Target title / indicator	Short-term target	Long-term target	Data source
LIP4	Asset condition – principal roads Proportion of total length in need of repair	8% of principal road length by 2013/14	8% of principal road length by 2017/18	Detailed Visual Inspection data supplied to TfL by LB Hammersmith and Fulham
LIP5	Road traffic casualties (KSIs) Total number of people killed or seriously injured in the calendar year	120 people killed or seriously injured by 2013	72 people killed or seriously injured by 2031	London Road Safety Unit
LIP6	Road traffic casualties Total number of casualties in the calendar year	972 casualties by 2013	950 casualties by 2031	London Road Safety Unit
LIP7	CO ₂ emissions Level of CO ₂ emissions emanating from ground-based transport, thousands of tonnes per year	355 thousand tonnes per year by 2013	215.5 thousand tonnes per year by 2025 (45.3% reduction on 2008 level)	GLA's London Energy and Greenhouse Gas Emissions Inventory (LEGGI)
Local targets				
LIP8	Bus journey times Average journey time on four main corridors during AM peak, Mon – Fri 0700 – 1000 (Routes 92, 140, 207 and E2, within LB Ealing, both directions)	29.6 minutes by 2013	29.6 minutes by 2031	iBus
LIP9	Air quality Mean annual PM10 concentrations of 4 Borough monitoring stations	31.09 µg/m ³ mean concentration by 2013/14	30 µg/m ³ mean concentration by 2031	LB Ealing Air Quality Progress Reporting: Hanger Lane and A40 monitoring stations
LIP10	Road casualties (cyclists) Probability of cyclist collision(s) per trip. Calculated by number of total cycle trips (LTDS data) divided by the number of cyclist collisions annually.	1 casualty/340,000 trips by 2013/14	1 casualty/440,000 trips by 2026	LRSU ACCSTATS database
LIP11	Road casualties (pedestrians) Probability of pedestrian collision(s) per trip at Ealing Broadway, Greenford, Southall, and West Ealing town centres combined (total pedestrians/pedestrian collisions)	1 casualty/1,848,000 trips by 2013/14	1 casualty/2,000,000 trips by 2031	LRSU ACCSTATS database/LB Ealing Annual Pedestrian Counts
LIP12	Car club bays Increase total number of car club bays in the Borough	107 car club parking bays by 2013	150 car club bays by 2030/31	Internal London Borough of Ealing counts
LIP13	Electric vehicle charging points Introduce electric vehicle charging points in the Borough	9 electric vehicle charging points by 2013/14	44 electric vehicle charging points by 2030/31 (To be reviewed on a regular basis)	Internal London Borough of Ealing counts
LIP14	Accessible bus stops Proportion of bus stops within the Borough which are compliant with DDA/Equality Act standards	400 bus stops (56%) DDA compliant by 2013	100% by 2031	Internal London Borough of Ealing counts

Proposed monitoring of significant environmental effects

- 5.5 The monitoring of significant environmental effects is intended to enable comparison between the predicted effects (as set out in the assessment) and the actual effects seen during implementation of the LIP and the Delivery Plan it contains.
- 5.6 Table 5 sets out the significant environmental effects identified by the SEA through the assessment of the LIP which are covered by the monitoring as proposed in the LIP as adopted. Relevant indicators already proposed in the LIP Performance Monitoring (as summarised in Table 4) are cross-referenced against each significant effect identified.
- 5.7 Table 6 identifies a number of potential gaps in monitoring of significant environmental effects based on a comparison of effects predicted and monitoring arrangements included in the LIP as adopted. However, many of these gaps are in practice monitored through other processes, such as the Annual Monitoring Reports of the LB Ealing LDF. In other cases LB Ealing indicated that monitoring was either not practicable (for example due to logistical or cost constraints) or that the monitoring proposed by the SEA was considered outside of the scope of LIP delivery.
- 5.8 Where potential gaps in monitoring have been identified this is noted in Table 6 and potential indicators proposed. These gaps and proposed additional or alternative indicators could be considered for inclusion in future revisions to the LIP, for example in monitoring of the next three-year Delivery Plan.

Table 5: Monitoring of significant environmental effects of implementing the LIP

Significant environmental effects identified by the SEA (all effects considered positive)	Relevant LIP indicators / targets (see Table 4)
Improved health of Ealing residents, through increased levels of physical activity	LIP1, LIP2
Reduced transport inequalities	LIP3, LIP12, LIP14
Reduced number and severity of transport related accidents, particularly involving pedestrians and cyclists	LIP5, LIP6, LIP10, LIP11
Improvements to streetscapes and the public realm	LIP4
Improvement to air quality	LIP9
Improvement in the quality of transport infrastructure	LIP4

Table 6: Potential gaps in monitoring significant environmental effects

Significant environmental effects identified by the SEA	Existing targets	Existing or proposed indicators and data sources	Comments on potential gaps
Potential positive effects			
Improvements to streetscapes and the public realm	<p>Local Strategic Partnership National Indicator (NI)195, target:</p> <ul style="list-style-type: none"> Year on year improvements in street and environmental cleanliness in the borough. <p>Ealing Sustainable Community Strategy Improve the cleanliness and design of our streets, town centres and parks so Ealing is in the top 25% of boroughs across the country</p>	<p>LB Ealing Local Strategy Partnership (LSP) has adopted National Indicator (NI)195:</p> <ul style="list-style-type: none"> Improved street and environmental cleanliness. <p>Ealing AMR 2010 measures:</p> <ul style="list-style-type: none"> Satisfaction with travel to and satisfaction with town-centres (survey data). <p>Source: Ealing Annual Residents Survey.</p>	Effect already monitored through NI195 and Ealing AMR processes.
Potential negative effects			
Noise disturbance from road and infrastructure maintenance and other activities	Noise or vibration from road traffic is not subject to the same statutory controls as other sources of noise, such as commercial or domestic sources.	Aircraft noise monitoring is included in LIP Neighbourhood 10 (see LIP Delivery Plan) to monitor compliance with the European Noise Directive. However this is not integrated into the monitoring of the LIP and is not related to the effects of the LIP.	Potential gap in monitoring. LB Ealing have indicated noise monitoring data is not currently available. Could be included in future LIP monitoring.
Damage to or loss of street trees	<p>MTS</p> <ul style="list-style-type: none"> (London wide) 10,000 additional street trees by 2012. 	<p>LB Ealing street and park trees web-pages¹⁷ indicate that:</p> <p><i>“To meet its legal obligations the council manages its trees by carrying out tree inspections in each electoral ward every three years”.</i></p>	Effect already monitored through LB Ealing street and parks inspections. However, street tree data is not collected separately and this could be included in future LIP monitoring.
Use of materials and waste generation (associated with construction)	<p>No relevant London / Ealing targets exist for construction and demolition waste.</p> <p>BRE Construction Resources and Waste Road Map¹⁸:</p> <ul style="list-style-type: none"> Halve the amount of (non-aggregate) construction waste produced by 2015; and Halve the amount of construction, demolition and extraction waste going to landfill by 2012 as a result of re-use and recycling. 	<p>Ealing LDF AMR Core Output Indicator:</p> <ul style="list-style-type: none"> Production of secondary and recycled aggregates. <p>However the AMR 2009 notes that data are not available for this indicator and there is no integration with the LIP.</p>	<p>Effect already proposed for monitoring in LDF AMR monitoring, although data not available.</p> <p>Monitoring of materials and waste associated with transport related construction / maintenance could be included in future LIP monitoring.</p>

¹⁷ http://www.ealing.gov.uk/services/environment/trees/street_and_park/

¹⁸ BRE (2008) Construction Resources and Waste Road Map

Appendices

APPENDIX 1 :

SEA RECOMMENDATIONS AND LB EALING RESPONSES

The table below summarises the comments and recommendations from the SEA commentaries provided to LB Ealing on 12 November 2010 and 12 December 2010 and summarises changes made to the draft LIP as a result. A meeting was also held (2 December 2010) to discuss the SEA comments and potential amendments to the draft LIP.

Note: References to specific paragraphs or sections within the LIP refer to the draft LIP as of 20 December 2010, and may not necessarily match paragraph numbers in the LIP as adopted.

SEA Comments and Recommendations	LIP Response / changes
Overall recommendations	
Consideration could be given to the inclusion under each objective of a sub-section (with sub-heading) setting out how the LIP can / will respond to the issues the evidence presents.	'Opportunities' section included under each Objective after 'Issues'.
It is not clear from the current draft LIP how the objectives and measures are linked to or relate to the proposed targets and indicators. It is recommended that this could be clarified in one or both of two ways: <ul style="list-style-type: none"> • By identifying each target / indicator with a unique reference number / code and referring to those targets which are relevant to each measure in the programme of measures in Section 4 of the LIP. • By including reference to measures to which each target / indicator is relevant in the table of targets and indicators. 	Addressed by tables 2.2, 2.3 and 2.4 in the draft LIP.
The evidence base could state more clearly (for example under Objective 2 – Increase sustainable travel capacity) that the number of walkable and cyclable trips represents an opportunity to significantly increase the share of walking and cycling trips in the borough.	Additional opportunity added: <i>-work with schools, colleges and large employers to promote a shift away from the private car and, where appropriate, flexible working arrangements, including staggered hours to alleviate pressure on the public transport during the peak periods</i>
More explicit recognition could be given within the LIP evidence base to the importance of modal shift away from private car use wherever possible and the multiple benefits this could bring for the borough in achieving environmental goals and helping meet multiple LIP objectives (e.g. reducing congestion and CO2 emissions, improving air quality etc.).	Text amended to emphasise opportunities to maximise the beneficial links between active travel, emissions and health.
Given the strength of the evidence presented from the SRTIP interim Issues and Opportunities report it is recommended that the fourth issue bullet in the evidence base under Objective 2 should include text such as: "there is considerable scope to increase walking and cycling in	Text amended to emphasise that opportunities exist as many car journeys in LBE are short or local and therefore there is scope for modal shift to sustainable transport.

SEA Comments and Recommendations	LIP Response / changes
the borough, as walking is slightly less popular than for outer and Greater London and evidence suggests a large number of trips which could be walked or cycled are currently being made using motorised transport”.	
In that the LIP represents a 20 year strategy for transport planning in Ealing it is recommended that any statement concerning increasing capacity is accompanied by acknowledgement that it is also important to seek to reduce traffic volumes, through modal shift to public transport, walking and cycling, and measures in other plans (e.g. the LDF) to reduce the need to travel	<p>Traffic restraint would be a significant change in policy direction. The MTS allows for the possibility of further road charging schemes, but does not advocate them. It does not suggest any other forms of traffic restraint either.</p> <p>Text amended to identify opportunities to pursue demand management, if necessary, in partnership with TfL, to improve the efficiency of the road network.</p>
Consideration could be given to the inclusion of a sub-section in the LIP describing how the LIP relates to other strategies in the borough (particularly the LDF) to ensure strong, coordinated action to manage future changes in transport patterns and population growth predicted in Ealing.	No change felt necessary.
Paragraph 3.107 in draft LIP could be strengthened such that it notes that transport is the third largest contributor, and that, as a result, it is of critical importance that transport related emissions are reduced to help meet the borough’s climate change mitigation targets.	<p>Text added to para 3.123 of the draft LIP:</p> <p><i>‘Therefore it is of critical importance that transport related emissions are reduced to help meet the borough’s climate change mitigation targets.’</i></p>
The west London SRTP Issues and Options report states: <i>“The wider adoption of more sustainable travel choices and reduction in the use of private motor transport has the potential to bring west London’s emissions down greatly”</i> (page viii). It is therefore recommended that additional text could be included to highlight how encouraging a modal shift to cycling, walking and public transport will be an important contributor to reduced per-capita emissions in Ealing.	<p>Additional opportunity added to evidence base:</p> <p><i>‘Encouraging a modal shift to cycling, walking and public transport will be an important contributor to reduced per-capita CO2 emissions in Ealing.’</i></p>
<p>In relation to Objective 8 and the evidence base presented under it: it is recommended that the scope of this sub-section should be broadened to consider the wider implications of climate change on transport in Ealing and transport infrastructure, and the need for, especially in the long-term adaptation to these impacts.</p> <p>While the exact nature of changes remains uncertain there is strong consensus on the types of impact likely to occur and it is recommended that more detail is included in the evidence base and issues identified relating to the type and range of climate change impacts likely in relation to transport in Ealing.</p> <p>Potential sources of additional information recommended include:</p> <ul style="list-style-type: none"> • The Impacts of Climate Change on London’s Transport Systems, London Climate Change 	<p>Para 3.128 deleted: <i>Hotter summers may damage elements of transport infrastructure, causing buckled rails and rutted roads, with their attendant disruption and repair costs. Changes in climate could change the affects in cold weather related disruption in the long-term. The extent of this is currently unknown.</i></p> <p>Added: <i>‘The potential effects of climate change include (but are not limited to): passenger heat discomfort, flash flooding, carriageway deterioration due to effects of extreme heat and/or cold, railway speed restrictions to safeguard rails during very hot weather, increased requirement for greenspace and trees to provide relief from the heat’.</i></p> <p>Rewording of Objective 8 Extreme Weather to Climate Change</p>

SEA Comments and Recommendations	LIP Response / changes
<p>Partnership, 2005: http://www.london.gov.uk/lccp/publications/transport.js p</p> <ul style="list-style-type: none"> The Mayor's London Climate Change Adaptation Strategy – Public Consultation Draft, Mayor of London, 2010: http://www.london.gov.uk/climatechange/strategy The UK Climate Impacts Programme (UKCIP): http://www.ukcip.org.uk/index.php 	<p>Distinction made between:</p> <p>Mitigation – reduce emissions</p> <p>Adaptation – methods to ensure infrastructure is resilient.</p>
<p>Paragraphs 3.76 – 3.78 in the draft LIP: it is recommended that how the two cycling targets (MTS and Ealing Cycling Strategy) relate to each other, and which is to be sought through the LIP measures could be clarified.</p>	<p>After Para 3.94 added:</p> <p><i>‘Based on LTDS data from 2005 to 2008, around 12,400 cycle trips are made by Ealing residents on an average weekday (1.6% modal share). Increasing this in line with the Mayor’s Transport Strategy targets would mean moving to 5% of all trips, or increasing the number of cycle trips to around 38,750 per day’. (from LBE Cycling Strategy)</i></p>
<p>Paragraph 3.84 in the draft LIP refers to evidence relating to controlled parking zones around stations not resulting in sustained cycling increases. The evidence source is not included / referred to, and it is recommended it should be included to support this statement.</p>	<p>Reworded to state that additional measures to the introduction of a CPZ are required to produce sustained increases in cycling mode share. Also emphasise that importance of increasing the catchment areas of Crossrail stations by providing significant cycle parking.</p>
<p>Typographical errors noted:</p> <ul style="list-style-type: none"> Paragraph 1.9: final sentence “for implementing the MTS in the its area”. Paragraph 1.10: first sentence appears incomplete. Paragraph 3.25: final sentence “planned economic grow...”. Paragraph 3.28: third sentence “car ownership has increased up with...”. Paragraph 3.37: final sentence “...local economy giving a access to...”. Paragraph 3.52: first sentence “In order to reduce congestion and smoother traffic flow...” Paragraph 3.107: reference should be to CO2 emissions rather than “air pollution”. Paragraph 3.109: final sentence “...with 32% of total road industry”. Should read “emissions”. The first sentence of paragraph 3.110 is unclear and 	<p>All corrected.</p>

SEA Comments and Recommendations	LIP Response / changes
may benefit from re-writing.	
Recommendations on the Objectives	
<p>Objective 1:</p> <ul style="list-style-type: none"> The wording could be modified to give stronger emphasis on the safety of pedestrians, cyclists and motorcyclists, changing the word 'including' to 'in particular'. 	<p>Reworded 'Objective 1:</p> <p><i>Improve road safety on the Borough transport network for all users, including in particular pedestrians, cyclists and motorcyclists'.</i></p>
<p>Objective 2:</p> <ul style="list-style-type: none"> Potential ambiguity in this objective can be reduced by clarifying what is meant by "sustainable travel capacity", either by changing the wording of the objective or by including a footnote or definition. This objective could be strengthened by broadening its scope for example by referring to the need to "increase sustainable travel capacity (walking, cycling and public-transport) on the entire borough transport network, and in particular key links". 	<p>Definition added: <i>'Sustainable travel capacity is the ability of modes such as walking, cycling and public transport to provide for a significant proportion of journeys.'</i></p>
<p>Objective 3:</p> <ul style="list-style-type: none"> The wording of this objective could be modified to include the following text after improve journey time reliability: '...for all road-users, particularly buses, cyclists and pedestrians'. 	<p>Reworded 'Objective 3:</p> <p><i>Smooth the flow of traffic and improve journey time reliability for all road-users, particularly bus passengers, cyclists and pedestrians'</i></p>
<p>Objective 4:</p> <ul style="list-style-type: none"> The second half of the objective could be strengthened by rewording: "...protecting and enhancing the urban and natural environment". 	<p>Reworded to 'Objective 4:</p> <p>Improve quality of life for residents, businesses and visitors to the Borough, enhancing the urban and protecting the natural environment protecting and enhancing the urban and natural environment'</p>
<p>Objective 5:</p> <p>No specific recommendations</p>	<p>No change.</p>
<p>Objective 6:</p> <ul style="list-style-type: none"> The objective could include the text "..., neighbourhood centres..." after "main town centres". 	<p>Reworded 'Objective 6:</p> <p><i>Improve the quality and access to Ealing's main town centres, neighbourhood centres and regeneration areas for all'</i></p>
<p>Objective 7:</p> <ul style="list-style-type: none"> Recommend including additional text at the end of Objective 7: "...for the benefit of all road users'. 	<p>Reworded 'Objective 7:</p> <p><i>Improve the condition of principal roads within the Borough for the benefit of all road users'</i></p>
<p>Objective 8:</p> <p>Refer also to recommendations under overall comments above.</p> <p>Objective should refer to climate change adaptation rather than just resilience to extreme weather events, as these</p>	<p>Issues edit to include: <i>'Unpredictable weather events and changing climate places demand on engineering measures, materials and costs to adapt'</i></p> <p>Other points considered relatively insignificant</p> <p>However clearer distinction made between mitigation</p>

SEA Comments and Recommendations	LIP Response / changes
<p>are just one likely climate change impact which will affect transport and travel in Ealing. This could be achieved by either:</p> <ul style="list-style-type: none"> • Changing the wording to refer to ensuring Ealing's transport network and infrastructure is adapted to future climate change; or, • Splitting the objective into two separate sub-objectives (e.g. 8a and 8b): one focussing on climate change mitigation – decreasing transport related CO2 emissions; the second seeking to ensure that Ealing's transport network and infrastructure is adapted to future climate change. 	and adaptation.
Recommendations on the programme of measures	
<p>While it is understood that the omission of specific implementation detail within the draft LIP Programme of Measures is at the request of TfL, it would be valuable for the narratives under each package to articulate more clearly the nature and scale of interventions and change expected.</p>	<p>Included e.g.s of improvements, i.e cycle parking, BSA improvements, decluttering, pedestrian refuges, footway resurfacing etc</p> <p>Also addition of Table 4.1</p>
<p>It is recommended that consideration be given to ensuring that measures intended to improve journey time reliability for public transport do not in practice benefit private car users disproportionately.</p>	Inclusion of text on importance to travel choices.
<p>To enhance environmental and social outcomes as well as improving the likelihood of meeting all LIP objectives, consideration should be given to modifying the overall emphasis of the programme of measures, for example by partial reallocation of funding from selected Corridors and Neighbourhoods packages and increasing that available for Smarter Travel measures, perhaps particularly Cycle Hubs and the West London Travel Plan network.</p>	<p>Objective 2, Opportunities: some text to the effect of: All Corridors and Neighbourhood Schemes will include measures to add to cycle provision and support associated Smarter Travel measures.</p> <p>Text added to explain that CANs are location specific, whilst Smarter Travel usually refers to Borough-wide initiatives or those in various locations across the Borough.</p>
<p>More explicit mention could be made of the integration of proposed measures with Crossrail stations in the relevant Corridor package narratives.</p>	<p>Below included in new Table 4.1:</p> <p><i>Station Access (including Crossrail stations)</i></p> <p><i>Cycle parking, pedestrian crossing facilities, improved bus interchange, better information provision, safety and security enhancements, public realm improvements</i></p> <p><i>Zebra, Puffin and Toucan Crossings, Cycle Stands, CCTV, Information Boards, repaving</i></p>
<p>Currently none of the measures refer to or seek to contribute to adaptation to climate change for Ealing's transport network and infrastructure. It is recommended that consideration be given to the inclusion of text within specific measures to ensure that interventions contribute to the objective of climate change adaptation.</p>	No change felt necessary.

SEA Comments and Recommendations	LIP Response / changes
<p>Maintenance measures:</p> <p>It is recommended that text is included in the draft LIP (section 3 or section 4) to describe and seek to maximise opportunities to realise broader environmental and physical improvements / enhancement through maintenance schemes.</p>	<p>Objective 7, Opportunities text added:</p> <p><i>Where possible, the Council will seek to co-ordinate maintenance and enhancement works together to minimise disruption and attain economies of scale.</i></p>
<p>Major schemes – Ealing Broadway Interchange:</p> <ul style="list-style-type: none"> • In addition to ensuring no net loss of open space to Haven Green additional text could be added to the scheme to seek to "...enhance existing and provide new open space". • The wording in relation to cycle parking could be clarified to seek to "...improve the quality and security of and increase the amount of cycle parking". • The final sentence could be clarified to ensure that "...adequate capacity to provide for growth in rail and bus use as well as for increased walking and cycling to and from Ealing Broadway". 	<p>No change felt necessary.</p>
<p>Major schemes – Acton Town Centre:</p> <p>The text could be modified to include the provision of new green open space and tree planting in proposed public space improvements.</p>	<p>No change felt necessary.</p>
Recommendation on the draft LIP indicators and targets	
<p>Consideration could be given to setting more ambitious targets for increases in the percentage of travel by walking and cycling, higher than the 1% change for walking and 0.4% change for cycling.</p>	<p>N/A -Targets already decided. Only a 3 year period with small interventions, especially walking.</p> <p>Cycling Target is tied in with the LBE Cycling Strategy</p> <p>Text amended to state that cycling levels have remained static in recent years so a modest target is appropriate.</p>
<p>Targets are set and monitoring is undertaken of NOx and NO2 (as well as PM10) at each of the four air quality monitoring stations and that the location of each of the four stations is specified under this indicator.</p>	<p>It will be difficult to positively influence NOx and NO2 – AQ officer advice.</p> <p>Single air quality target for PM10 is considered sufficient.</p>
<p>More ambitious targets could be set for the provision of car club parking bays in the borough (with a measure to promote these) e.g. an increase of 30 bays by 2013 rather than the 16 proposed, in order to help address the growth in private car ownership in the borough and stabilise this.</p>	<p>Advised that proposed change is realistic, therefore changed as follows:</p> <p><i>Previous, '2010 -77 bays, 2011 -83 bays, 2012 -88 bays, 2013 -93 bays'</i></p> <p><i>Proposed, '2010 –77 bays, 2011 –87 bays, 2012 –97 bays, 2013 -107 bays'</i></p>
<p>The installation of cycle parking bays is monitored with annual targets set. As a minimum these should include those bays funded or facilitated by LBE.</p>	<p>Included as Cycle stands are an MTS2 High Level Output</p>

SEA Comments and Recommendations	LIP Response / changes
<p>Possible additional indicators:</p> <p>Monitoring has a two-fold role: measuring progress towards targets or in meeting improvement objectives; and, gathering data and information on important issues / factors not currently measured, and in particular monitoring significant environmental effects identified by the SEA as potentially arising from implementation of the LIP.</p> <p>It is recommended that space be given within the monitoring programme of the LIP to include a limited number of additional environmental indicators to be identified by the SEA through its assessment.</p>	Noted.
Additional SEA comments 12 December 2010	
<p><u>Recommendation</u></p> <p>The inclusion of text relating to street trees in paragraph 3.86 and table 4.5 is welcomed.</p> <p>It is recommended that the LIP could also include text under Objective 8 (climate change mitigation and adaptation) relating to the value and importance of street trees in relation to climate change adaptation.</p> <p>Text could also state that the implementation of corridors and neighbourhoods measures should ensure no net loss of street trees, and where possible the planting of additional street trees.</p> <p>Given that Annex 1 of the draft LIP notes that LBE is required to report to TfL on outputs including relating to street trees it is recommended that specific monitoring should be considered in relation to street trees.</p> <p>Recognising that there is currently limited LBE data on street trees, the LIP could propose the monitoring of all new planting and loss of street trees due to the implementation of LIP associated interventions.</p> <p><u>Justification</u></p> <p>The importance of street trees for climate change mitigation / adaptation and in enhancing quality of life / wellbeing is recognised within the MTS (e.g. paragraph 624 and proposal 113). Street trees can also have positive effects on air quality.</p> <p>The draft replacement London Plan (2009)¹⁹, the Mayor's manifesto "London's Great Outdoors"²⁰ and the recently launched national "Big Tree Plant"²¹ all seek to encourage the planting of street trees. The Mayor's draft Climate Change Adaptation Strategy²² also identifies street trees as being an important aspect of adaptation. CABE have published advice and information relating to street trees²³.</p>	<p>Following consultation with Tree Section Manager, seeking to maintain the existing borough level of approximately 26,000 is considered realistic.</p> <p>Text added to evidence base under Objective 4 Quality of Life built/natural environment, opportunities:</p> <p><i>To explore opportunities for planting street trees to enhance biodiversity, and in the delivery plan that; We will work with the Tree Section to protect existing street trees and explore opportunities for planting new trees during the course new projects.</i></p>

¹⁹ For example Chapter 6 – Transport, paragraph 6.33 states "The Mayor is keen to promote street trees, and proposals for public realm improvements should include additional planting, while avoiding removing trees in the name of decluttering".

²⁰ <http://www.london.gov.uk/greatoutdoors/>

²¹ <http://thebigtreeplant.direct.gov.uk/index.html>

²² <http://www.london.gov.uk/climatechange/strategy>

²³ <http://www.cabe.org.uk/sustainable-places/updates/no-trees-no-future>

SEA Comments and Recommendations	LIP Response / changes
<p><u>Recommendation</u></p> <p>It is recommended that an additional “opportunity” could be included in relation to Objective 2 (promote sustainable transport capacity) to reflect the importance of providing sufficient infrastructure for walking and cycling, and ensuring public transport provision in areas where significant new housing/commercial development is proposed even if this provision precedes occupation.</p> <p>This may be achieved by identifying the need to reflect transport planning and local development / development management policies within the emerging Ealing LDF.</p> <p><u>Justification</u></p> <p>Where large scale housing or commercial developments are proposed, ensuring provision of facilities for walking / cycling and public transport before occupation can help establish environmentally preferable travel patterns from the outset.</p>	<p>Text added under Objective 2, Opportunities:</p> <p><i>‘All new developments to provide sufficient measures to encourage walking, cycling and public transport’</i></p>
<p><u>Recommendation</u></p> <p>The inclusion of text in relation to climate change adaptation is welcomed. In addition to clarifying Objective 8 and including additional supporting text at paragraph 3.128, it is recommended that:</p> <ul style="list-style-type: none"> • Subheading currently “Improving resilience to extreme weather events” is amended to reflect the wider focus of the objective, for example: “Ensuring Ealing’s transport infrastructure is adapted to future climate change”. • An additional opportunity could be included under Objective 8 to recognise that the implementation of measures through the LIP provides an opportunity to improve the resilience of the existing transport network and ensure new infrastructure is appropriately climate resilient. This would be inline with Proposal 110 of the MTS²⁴. <p><u>Justification</u></p> <p>The significance of the predicted impacts of climate change on transport is recognised through, for example, the Mayor’s draft Climate Change Adaptation Strategy²⁵, which also includes a summary of impacts and opportunities on London’s transport network / infrastructure (Table 9.1).</p>	<p>Text added under Objective 8, Opportunities:</p> <p><i>‘Improve the resilience of the existing transport network and ensure new infrastructure is appropriately climate change resilient’</i></p>

²⁴ MTS Proposal 110: The Mayor, through TfL, and by working with the London boroughs, Network Rail, Highways Agency, airport operators and other stakeholders, will determine the vulnerability of transport assets to the impacts of climate change and maintain existing infrastructure (including remedial works where effective and affordable) to improve resilience to climate change.

²⁵ <http://www.london.gov.uk/climatechange/strategy>

APPENDIX 2:

TFL COMMENTS AND LB EALING RESPONSES

This table summarises feedback submitted to LB Ealing by TfL regarding the draft LIP submitted by LB Ealing on the 22nd of December 2010. Through their formal review, TfL made a larger number of general comments and observations, and only those comments which requested or related to a specific action or change to the draft LIP have been included in this summary.

Transport for London comments / recommendations	LB Ealing Response
Ealing LIP objectives and statutory context	
Mention of NMD and HAMP and how these have influenced the local objectives should be included (this can be done simply by adding a paragraph to either the relevant objective evidence base or to the policy section.	References to policy influence of NMD and HAMP added
Adding a specific paragraph prior to para. 3.17 stating that the objectives cover the timeline of the MTS or up to 2031, whichever is more appropriate.	Text added that the objectives cover the period up to 2031
the borough may like to consider adding a 'X' in the cross referencing tables 2.2 & 2.3 against Objective 5 and the 5th MTS Goal and Challenge 2 respectively	Changes made
The borough may also wish to consider adding in some details about how personal security affect Objective 5	Personal security text added to Objective 5 issues
Programme of investment / Delivery Plan	
a) Timelines need to given to the interventions in table 4.4, even if these are 'ongoing throughout the life of the plan up to and including 2031' and specific timelines need to be assigned to the specific interventions in Appendix A.	Text added 'ongoing throughout the life of the plan up to and including 2031'. All specified projects have funding/implementation timescales.
b) More specific details need to be added to Table 4.7 to satisfy the requirements concerning the Mayor's High Priority Outputs as set out in the Guidance on pages 81/82 eg nos. and types of cycle parking, how EVCPs will be encouraged through planning etc.	Further details added to Table 4.7 in relation to High Priority Outputs
c) As part of the LIP 2 Delivery Plan, the borough is showing £375k repayment for Petts Hill Bridge in 2011/12. However, TfL recently gave the borough permission to spread this cost over 3 years until 2013/14.	Repayment profile amended
d) Table 4.2 shows potential LIP funding. However, the potential funding from the Council Regeneration and Developer (S106) are significantly different from the figures shown in the 2011/12 Annual Spending Submission and the LIP Programme of Investment – see Appendix A.	Differences between Table 4.2 and Annual Spending submission reconciled
e) The borough are advised to make it clear to stakeholders that the Major Scheme entries in the programme are only aspirational at this stage and although, in principle, TfL are supportive of the initial scheme objectives we have not confirmed the funding needed for implementation.	Note added to confirm that Major Scheme funding is to be confirmed

Transport for London comments / recommendations	LB Ealing Response
Performance management plan	
(a) The two mandatory road safety targets appear to be set on incorrect baselines; note that these targets should be based on three-year rolling averages (as set out in the LIP Guidance). Please amend the baselines and revise the targets and milestones accordingly.	Targets and baselines amended accordingly
(b) Further definition of a number of the proposed local targets is required, in order that progress can be properly tracked against them going forward. For all of the local targets it is important that a robust mechanism is in place for the collection and reporting of the data required in order to monitor the target.	Further explanation/methodology text added to local targets as required
Consultation	
A section on consultation has been included but reference needs to be made to the statutory consultees in the final version	List of organisations included
Comments on mandatory indicators	
Mode share: walking The baseline figure should for 2006/07 to 2008/09 should be 26.7% rather than 27.0% as stated - please amend. The long-term target is ambitious though acceptable if the Council considers it to be achievable.	Amended accordingly
Mode share: cycling Under 'interim milestones' and on the graph, the milestone years should be 2010/11, 2011/12, 2012/13 and 2013/14 (as they are for the walking target).	Amended accordingly
Bus service reliability The short-term target is considered to be ambitious, given the Business Plan projections, though again acceptable if the Council considers it to be achievable. Are there any other relevant actions worthy of inclusion (for instance roll out of accessible bus stops, liaison with operators and members of the public, TfL to roll out SCOOT at additional signals etc)? Under 'interim milestones', the 2010/11 milestones should just be based on the 2010/11 figure (rather than 2009/10 to 2010/11), and likewise for the other milestones.	Noted but unchanged Accessible bus stops is a separate local target
Asset condition Under 'interim milestones', the 2010/11 milestones should just be based on the 2010/11 figure (rather than 2009/10 to 2010/11), and likewise for the other milestones. Will elements of maintenance be considered as part of future neighbourhoods and corridors schemes / major schemes, and if so is it worth including this under key actions for the Council?	Amended and consideration of maintenance under CANs projects text added
Road traffic casualties (KSI) The baseline used (146 KSIs) does not seem to correlate with data provided by LRSU. The baseline should be a three-year average, the 2006 - 2008 KSI average being 132 - please therefore amend the baseline and review the targets and milestones accordingly, providing further information on why the reduction that is proposed is considered appropriate. The milestones should be calendar years rather than financial years (so for instance the milestone for 2012 relates to the average of 2010 - 2012).	Amended accordingly
Road traffic casualties (total) The baseline used (1079 casualties) does not seem to correlate with data provided by LRSU. The baseline should be a three-year average, the 2006 - 2008 total casualty average being 1126 - please therefore amend the baseline and review the targets and milestones accordingly, providing further information on why the reduction that is proposed is considered appropriate. The milestones should be calendar years rather than financial years (so for instance the milestone for 2012 relates to the average of 2010 - 2012).	Amended accordingly

Transport for London comments / recommendations	LB Ealing Response
<p>CO₂ emissions Please specify the long-term target as a figure, as opposed to stating a 'reduction of 60% on 1990 levels by 2025'. Note that the advice note on setting targets for second round LIPs suggests a reduction of 45.3% for ground-based transport by 2025 (rather than 60%, which is the target across all sectors). What are the proposed milestone based on?</p>	Long-term target amended
<p>Local indicators</p>	
<p>Average journey time on four main bus corridors during AM peak (Mon - Fri 0700 - 1000) This local target is not clear and further information is required. What routes are included? What corridors or sections? What is the baseline - normally this is one month's data rather than three year's? Setting targets on route run times can be effective, but by lumping four routes together there is a danger that it is difficult to determine what is happening in the case of individual routes. Please reconsider this target and discuss with TfL if necessary.</p>	Four relevant routes identified March identified as annual benchmark
<p>Mean annual PM10 concentrations of 4 air quality monitoring stations This target seems sensible. Please specify the location of the monitoring stations (it would be worth including a plan showing the location of these as an appendix).</p>	Location added
<p>Cyclist casualties This target seems sensible, though it is not clear from where the trip data is derived. If this is from count sites, the figures obviously don't represent all cycling trips in the borough, or is it factored in any way? How will the trip data be kept consistent (for instance adding another count site in the future may result in a lower casualty rate per trip, even though this may not be the case)? Please discuss this with TfL.</p>	Methodology added
<p>Pedestrian casualties This target seems sensible, though it is not clear from where the trip data is derived. If the figures obviously don't represent all walking trips in the borough, is it factored in any way? How will the trip data be kept consistent (for instance adding another count site in the future may result in a lower casualty rate per trip, even though this may not be the case)?</p>	Methodology added
<p>Child KSIs Given the low figures involved, it might be worth considering whether to set this as a rate-based target instead? Otherwise it is suggested that the target be based on three-year averages (as for the mandatory road safety targets) to reduce the possibility of significant spikes in the data.</p>	Target removed due to small sample size
<p>Electric vehicle charging points This target seems sensible, though it might be worth making a point of stating the the long-term target will be reviewed on a regular basis as the take-up and use of electric vehicles develops in future years</p>	Text added 'To review in future years'

APPENDIX 3: PUBLIC CONSULTATION EVENTS

This table includes the issues raised by organisations, member of the public and councillors during the Draft LIP's public consultation events. The table includes the consultation comments, when and where they were made, the LB Ealing comment and the LB Ealing Action taken.

Consultee Comment	LB Ealing Response	LB Ealing Action
Public Consultation. Greenford Thursday 03/02/11		
Add cost breakdowns for individual elements in schemes for public consultation	Project detail	Do not include suggestion
Add speed and accident data, especially for road safety type schemes at consultation	Already made available on request	Do not include suggestion
Post implementation data for schemes should be made easily available	Already made available on request	Do not include suggestion
'Signposting' to more detailed data as likely only a select group of residents will want it	Already the case	Do not include suggestion
Add detail to LIP on 'consultation approach', Table 4.5, Annex 1	Consultation tailored to each project	Include suggestion
At which points/stage should consultation(s) take place? Involve ward forums at the formulative stage in schemes	Consultation tailored to each project	Do not include suggestion
Ensure cycling is taken into account in corridor schemes.	Already the case and referred to in executive summary	Do not include suggestion
Better enforcement of ASLs needed	Noted but not a LIP issue	Do not include suggestion
Better traffic signal enforcement	Noted but not a LIP issue	Do not include suggestion
Allow cycling in parks	Noted but to be considered on a case by case basis	Do not include suggestion
Cycle routes to be better advertised, e.g. plastic cards	Noted, Travel Awareness/Cycle Hub project detail	Do not include suggestion
Better joined-up thinking with other council departments e.g. Worpole Park Scheme	Noted	Do not include suggestion
Are future 'trial schemes' mentioned in draft LIP?	Project detail	Include suggestion
Better provision of 'stop & shop' parking. This should take precedence over loading bays which can be located in side roads, depending on the nature of the loading	Project detail to be considered on a case by case basis	Do not include suggestion
Ealing shopmobility to be located in Dickens Yard (north of Uxbridge Rd)	CANs map amended.	Include suggestion

Consultee Comment	LB Ealing Response	LB Ealing Action
Public Consultation. Ealing Monday 07/02/11		
More links to West London Sub-Regional Transport Plan	Already included - TfL acknowledged this, referred to in executive summary	Include suggestion
More on developments and transport s.106	Project detail, to be included in forthcoming Transport SPD	Do not include suggestion
Cross-boundary issues	Already included, referred to in executive summary	Include suggestion
West London Orbital light rail	No consensus to progress this project to extremely high costs	Include suggestion
Develop Ealing Broadway as a hub - Outer London Commission	Ealing Broadway Major Scheme bid made and included in LIP	Include suggestion
LBE needs stronger role to influence bus services	Bus Service Review to be undertaken	Do not include suggestion
LIP2 should cover 20 year horizon too	See para 1.6 and long-term targets, para 2.15 revised also	Do not include suggestion
Refer to Parking Service	Added p10, p12, Table 4.9/p75	Include suggestion
Include Park Royal Central Line station	No longer being progressed	Do not include suggestion
Car clubs need to be effective	Existing policy and target to expand car clubs	Include suggestion
Southall station has capacity issues	Noted but Network Rail/Crossrail responsibility	Do not include suggestion
New/revised objective on accessibility	See ECT comments in next section (Objective 6/p52)	Do not include suggestion
Public Consultation. Acton Wednesday 16/02/11		
A40 Green Corridor – TfL land/TLRN	Covered in LDF	Include suggestion
Link to Waste Plan	Links provided to LDF already	Include suggestion
Cycle superhighway (2015)	Included Table 4.6	Include suggestion
Lorries and freight signage, Park Royal Industrial Access	Covered by Corridor 3 and Neighbourhood 12	Do not include suggestion
CPZs, Parking and enforcement – include links to Parking Plan	Added p10, p12, Table 4.9/p75	Do not include suggestion
Businesses need sufficient infrastructure – S106 should fund this	Comment only	Do not include suggestion
Bus network, possible route Gypsy Corner to Gunnersbury Park and Acton to central London	Noted, to include in Bus Service Review	Include suggestion
Horn Lane –Low emission zone	London LEZ covers LBE which is also an Air Quality Management Area	Include suggestion
HS2 – now referred to in TfL/other projects	Table 4.6	Include suggestion
Grand Union Canal – expand references 'potential of the GUC for walking and cycling'	p24/3.12	Do not include suggestion
ORN (Olympic Route Network) – A40, A406 and A312	Add commentary regarding: 'managing impacts'	Possibly include suggestion

Consultee Comment	LB Ealing Response	LB Ealing Action
Public Consultation. Southall Thursday 17/02/11		
Evidence/actions/commitment/feedback to show how the Council was fighting the corner on behalf of residents regarding overcrowding and service levels on trains at Southall	Detail but issue noted	Do not include suggestion
Incorporating maintenance/repairs to existing roads and pavements as part and parcel of CANs schemes	Already considered	Possibly include suggestion
Public Consultation. Hanwell Tuesday 22/02/11		
Council needs to be more transparent with decision making around consultations e.g. Corridor 6	Consultation is a balance	Do not include suggestion
Delays to Crossrail programme, now 2019	Noted but Crossrail responsibility	Do not include suggestion
Bus capacity/crowding should be targets, especially for Uxbridge Rd	Noted but TfL responsibility	Do not include suggestion
North-south corridors, Greenford Ave not included in the CANs programme	Greenford Avenue has already been treated in the recent past	Do not include suggestion
Bus service needed from A40 to Brentford	Noted for Bus Service Review	Include suggestion
Minibus service Hanwell Station to Ealing Hospital suggestion/proposal not a good use of resources	Noted for Bus Service Review	Do not include suggestion
Include a Post-tram solution on Uxbridge Road – a commitment by TfL but nothing forthcoming to date	Included in Objective 2, opportunities, p40	Do not include suggestion
Hanwell Bridge is a pinchpoint for traffic and hinders east-west movement	Noted but Corridor 1 project detail	Do not include suggestion
No/low car housing needs careful implementation to prevent existing residents suffering additional parking pressure	To included in emerging Transport SPD	Include suggestion
Targets – include School Travel Plans - SMoTS, walk and cycle to school	Considered but already included total mode share plus have 7 madatory and 7 local targets	Include suggestion
LBE and TfL need to co-ordinate more to combat rat-running	Included Objective 3 opportunities, p39	Do not include suggestion
LIP needs to plan for long-term future as well as next 3 years	Included para 1.6 and long-term targets, para 2.15 revised also	Include suggestion
Hanwell station - , better information, ramps/lifts and more frequent/Sunday service apply pressure to FGW	Noted	Do not include suggestion
Hanwell station –need south entrance reopening	Included in Corporate Plan	Do not include suggestion

Consultee Comment	LB Ealing Response	LB Ealing Action
Greenford Branch line should go to Ealing Broadway not just West Ealing when Crossrail opens	Not an LBE project currently	Do not include suggestion
Cycle contra-flow at Ealing Broadway	Project detail	Include suggestion
Air quality in LBE is poor and needs to be improved, but residents recognised that LBE's role is limited here	Noted	Do not include suggestion
Include Exec Summary	Incorporated	Do not include suggestion

APPENDIX 4:

PUBLIC CONSULTATION CORRESPONDENCE

This table includes the issues submitted to LB Ealing via the Draft LIP's online public consultation on the draft LIP held between 20 December 2010 and 31 March 2011. The responses are made largely by organisations. The table includes the consultation comment, the LB Ealing response and the LB Ealing Action taken.

Comment	LB Ealing Response	LB Ealing Action
London Diocesan Fund		
Support sustainable transport, improving air quality and reducing carbon emissions in general	Noted	Do not include suggestion
Highways Agency		
Need to consider impacts to England's Strategic Road Network (HA motorways and trunk roads) when delivering the LIP and contact HA if this is the case	Noted	Do not include suggestion
West Acton Resident's Association		
All comments regarding N21	Passed to Project Manager - PP	Do not include suggestion
Ealing Cycle Campaign		
A network of all-weather Greenways is required to allow new and returning cyclists to practice their skills before tackling busy roads, as well as for leisure cycling		Do not include suggestion
Removal of parking from the Uxbridge Road cycle lanes would reduce the risk of collisions		Do not include suggestion
Vehicle actuated speed signs are preferred to vertical deflection		Do not include suggestion
Much higher investment will be required to achieve the intended mode shift		Include suggestion
The prevention of cycle theft must remain high on the council's agenda		Do not include suggestion
Cycling is a promising way of dealing with the recognised lack of orbital routes	Already covered by Objective 2 'key links'	Do not include suggestion
The existing cycle route network shown on the London Cycle Guides requires greater recognition, with priority for maintenance and better signing	To be carried out in liaison with adjacent boroughs	Do not include suggestion
The charge for motor vehicle parking permits should be linked to vehicle size		Do not include suggestion
All highway design staff must be familiar with LCDS		Do not include suggestion
Any proposed removal of guardrails must take into account cycle parking		Include suggestion
The multi-modal approach proposed for Corridor 1 is supported, but a sufficiently fundamental approach must be taken to design including local widening at key junctions where appropriate.		Do not include suggestion

Comment	LB Ealing Response	LB Ealing Action
N/A (Private Citizen)		
The opportunity should be taken to put double yellow lines on Uxbridge Road at the junction with Fordhook Avenue and Granville Gardens to improve road safety	Passed to Project Manager	Do not include suggestion
Ealing Community Transport		
New Objective (9) Improve accessibility and independence for all people with reduced mobility, see letter for full details (incorporate relevant sections into Objective 6)		Do not include suggestion
Several other minor corrections/suggestions/issues for inclusion, see letter for full details (incorporate relevant sections into Objective 6)		Do not include suggestion
NHS Ealing		
Welcome that SEA identified air pollution, health, quality of life and climate change as areas to take action		Do not include suggestion
Supportive of Objectives 5, promote healthy travel and 6, quality of life that will have a positive impact on health		Do not include suggestion
Include implementation of the A40 25 m corridor Green Corridor Strategy	Covered in LDF	Do not include suggestion
No additional infrastructure identified for the North Acton (Gypsy Corner/Southern Gateway) designated as a Green Travel Zone		Do not include suggestion
North Acton Station requires an increase in capacity, improvements to platforms, installation of lifts or widening of the station doors/entrance and ticket office improvements	Covered in LDF	Do not include suggestion
Green corridor cycle route along A40 (S106 funded) should be built	Covered in LDF	Do not include suggestion
Noise and air pollution are significant issues for the A40 corridor		Include suggestion
Proposed WLWP sites are unsuitable	WLWP/LDF issue	Do not include suggestion
Freight vehicle access to Park Royal needs to be improved, away from residential properties	Covered by Corridor 3 and Neighbourhood 12	Include suggestion
LB Harrow		
Include Greenway route from Stanmore through Brent and to Ealing in schemes	Included in Appendix A and Map 1	Do not include suggestion
LB Hillingdon		
Want to work in partnership with LBE (already included)	Already included	Include suggestion
Have concerns over Southall Gasworks impact on A312	Detail tbc during project phase	Include suggestion
Jointly promote walking and cycling on GUC	Detail tbc during project phase	Do not include suggestion
London TravelWatch		
Include BSA works and bus journey time target	Already included	Do not include suggestion
Include 3G bus priority measures	Superseded	Include suggestion
Measures for buses, traffic management, cycling, smarter travel and public realm welcome, but appear insufficient to make a substantial difference without traffic restraint	Noted but no current consensus for traffic restraint	Do not include suggestion

Comment	LB Ealing Response	LB Ealing Action
British Waterways		
The draft LIP should give greater recognition of, and support to, freight by canal	Included p24/3.12	Include suggestion
Support inclusion of canal towpath enhancements		Do not include suggestion
Para 3.12 – Recognise full value of waterway network, not just a hindrance	Included p24/3.12	Do not include suggestion
Kingsdown Resident's Association		
C1 alternative cycle route to Uxbridge Rd would be better, see Big Society Lido Junction report	All project detail and passed onto project managers	Do not include suggestion
C2 Urgent need for bus shelter at South Ealing station		Do not include suggestion
C4 Why do Councillors want enforcement cameras removed?		Do not include suggestion
C4 North-south flows need to be improved		Do not include suggestion
Grand Union Canal – British Waterways may want to licence cyclists		Do not include suggestion
N17 parking should be removed to improve safety		Do not include suggestion
None of AB's local Underground stations have level access		Do not include suggestion
Scheme consultation process needs to be improved		Do not include suggestion
Poor provision for cyclists currently (Lido junction report)		Include suggestion
Main roads need more frequent checks for surface damage especially around ironwork		Do not include suggestion
Ealing Friends of the Earth		
Para 3.52 correction needed for number of Crossrail trains per hour	Incorporated	Do not include suggestion
Save Ealing's Centre		
Need better strategic overview, mention WLTS work including west London Orbital	(partnership working already mentioned in General and Policy contexts, no consensus to progress West London Orbital project to extremely high costs)	Include suggestion
Strengthen north-south links in LBE and mention that the Transport Network focuses too strongly on Ealing Broadway (including Crossrail)	Objective 2 already covers key links and Ealing Broadway is the main interchange/town centre in the Borough	Do not include suggestion
Better integrate LIP and LDF, a strategy is needed to manage the Uxbridge road corridor	Already identified in LDF and as Corridor 1	Do not include suggestion
Welcome Ealing Broadway Interchange project, but consider that £4.5m is insufficient	Noted but competitive project bid has to be justified	Do not include suggestion
A4020/B455 junction (Corridor 2) issues need addressing	Pproject already included further issues are project detail	Do not include suggestion

Comment	LB Ealing Response	LB Ealing Action
Lido junction (Corridor 4) welcome pedestrian improvements but effects increased red phase and Crossrail (West Ealing) effects need to be taken into account	(project detail passed to Project Manger - MH	Do not include suggestion
Parking policies should be included in the LIP	LBE Parking Policy document referred to p10, p12, Table 4.9/p75	Do not include suggestion
LB Hammersmith and Fulham Highways		
also have proposals to improve A4020 Uxbridge Road – wish to work together	Comments passed to C1 Project Manager PP	Do not include suggestion
English Heritage		
Comments relating to the Environmental Report:		
Section 3 - Environment baseline does not include parks, gardens and archaeology		Noted in SEA Addendum
Table 16 – Note enhancement opportunities to heritage assets through contextually sensitive design		Noted in SEA Addendum
Section 5, table 29 – refer to contextually sensitive design when developing transport proposals		Noted in SEA Addendum
Para 5.27 – EH suggest the historical environment is not static		Noted in SEA Addendum
Section 6 – commit to high quality design and be contextually sensitive in terms of scale, form, materials and location for in the implementation of transport provision and management		Noted in SEA Addendum
LIP Objective Comments:		
(para 2.13 and tables 2.2-2.4) – Compare against the Borough Core Strategy	References already to Sustainable Community Strategy but specific reference to LDF now added here	Include suggestion
Objective 4 - take account of the need for contextual sensitive design based upon an understanding of both the local and historic character - use high quality design to enhance the Borough's heritage assets (such as conservation areas, and settings of listed buildings)	Urban design covered by the LDF and emerging Urban Realm Strategy	Do not include suggestion
GSK		
Orbital transport needs to be improved, particularly with a two-dimensional network of cycle routes	Already covered by Objective 2 'key links'	Do not include suggestion
Priority should be given to street maintenance on London Cycle Guide routes and these should be clearly signed.	Surfacing and signing are considerations in Corridors and Neighbourhood schemes, maintenance covered by an existing methodology	Do not include suggestion
Include West London Orbital	No consensus to progress this project to extremely high costs	Do not include suggestion
Ealing should be supporting the Hounslow-Staples Corner rail scheme	Not an existing, official scheme, benefits to Ealing unclear, included in the West London S RTP	Do not include suggestion

Comment	LB Ealing Response	LB Ealing Action
The cycling mode share target of 5% is unambitious but will be difficult to achieve without higher levels of investment.	Noted but appears to be a contradictory statement	Include suggestion
BAA Heathrow Airport Ltd		
Recognise existing high public transport mode share of travel from Ealing	Acknowledge important that high sustainable mode share is maintained and progress builds upon	Include suggestion
Refer to GWML as opposed to Heathrow corridor	Incorporated	Include suggestion
Evidence suggests that Heathrow Airport only has a minimal impact on Air Quality in Ealing	Acknowledged but there is a contributory background effect	Include suggestion
Evidence suggests that Heathrow Airport only has a minimal impact on CO2 emissions in Ealing	Acknowledged but there is a contributory background effect	Do not include suggestion
Suggests that LBE reduces CO2 emissions by: promoting low emission vehicles, promoting higher vehicle occupancy, increasing the mode share of walking, cycling and public Transport	Already included Objectives 2, 5, and 8	Do not include suggestion
Central Ealing Residents' Association		
Highlighted current issues and Proposed solutions at Haven Green and Ealing Broadway station	Project detail NOD aware, Ealing Broadway Interchange and Neighbourhood 24 haven Green East already included in delivery plan	Do not include suggestion
Uxbridge road, (Ealing Common) Cycle tracks in poor condition	Project detail but noted	Do not include suggestion