

Planning for Schools

Development Plan Document

Sustainability Appraisal Incorporating Strategic Environmental Assessment
Commentary Report (Full Technical Version)

Northolt

Greenford

Perivale

Park
Royal

Hanwell

Ealing

Acton

Southall

West
Ealing



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1. Introduction

This report is the Sustainability Appraisal of the Planning for Schools Development Plan Document (hereon referred to as the 'Schools DPD') Issues and Options Paper. The Schools DPD will provide site specific allocations and accompanying policies for future school provision in the borough. The Document will complement the Development Strategy, Development Management and Development Sites Development Plan Documents.

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

2. The Sustainability Appraisal Process

In accordance with Section 5 of the Planning and Compulsory Purchase Act 2004, and EU Directive 2001/42/EC, a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are required for Development Plan Documents (DPDs), produced as part of the Local Plan.

Paragraph 165 of the National Planning Policy Framework states that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.

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

The primary purpose of the Sustainability Appraisal (SA) is to promote sustainable development through the better integration of sustainability considerations in the process of preparing and adopting plans. The SA is an iterative process allowing us to identify

and report on the likely significant effects of the plan, and the extent to which the implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.

The completion of an SA is one of the 'tests of soundness' legal requirements that Planning inspectors will use to evaluate the soundness of DPDs at independent examination.

3. The Scope of this Report

In May 2013, the Council published a new Sustainability Appraisal Scoping Report for use alongside the preparation of Development Plan Documents (DPD). The Scoping Report includes baseline information about Ealing and identifies key environmental and sustainability issues for the Borough. To provide a sound basis for analysis, the report also identified relevant plans and programmes along with key sustainability issues and problems. From these issues, objectives and indicators have been produced. The objectives form part of the appraisal framework against which Local Plan documents will be assessed. The report is generic and therefore suitable to aid the appraisal of most Local Plan documents. The Scoping Report, and in particular the SA framework, was refined following consultation with statutory consultees. The updated SA framework is set out in Appendix 2.

This report utilises the established framework, providing a sustainability commentary on the Schools DPD Issues and Options Document, published for consultation in October 2013. It effectively represents an interim/progress report prior to publication of the draft SA report at Final Proposals stage in September 2014, and the completion of the full SA report at Submission stage (December 2014). It should also be noted that this report addresses the Schools DPD document only, and separate commentary reports will be published for other DPD's as these evolve.

4. Appraisal Timeline

The key stages in the SA of the Schools DPD are set out in table 1 overleaf.

Table 1 – Key SA Stages

Date	Stage A	Pre-production - Scoping
May 2013	Stage A1	Review other policies, plans and programmes, and sustainable development objectives
May 2013	Stage A2	Collecting Baseline information
May 2013	Stage A3	Identifying sustainability issues and problems
May 2013	Stage A4	Developing the SA framework
May 2013	Stage A5	Consulting on the scope of the SA.
	Stage B	Production - Options
Sept 2013	Stage B1	Testing the DPD objectives against the SA Framework
Sept 2013	Stage B2	Developing the DPD options
Sept 2013	Stage B3	Predicting the effects of the DPD based on Issues and Options
Sept 2013	Stage B4	Evaluating the effects of the DPD based on Issues and Options
Sept 2013	Stage B5	Considering ways of mitigating adverse effects and maximising beneficial effects
Oct 2013		Produce commentary of appraisal findings of the Issues and Options for internal consideration & informal consultation with stakeholders
Sept 2013	Stage B6	Proposing measures to monitor the significant effects of implementing the DPD.
June 2014		Developing the Final Proposals, with consideration of findings from SA of Issues and Options
July 2014	Stage B3 Part 2 – Final Proposals	Predicting the effects of the DPD based on the Final Proposals
July 2014	Stage B4 Part 2 – Final Proposals	Evaluating the effects of the DPD based on the Final Proposals
July 2014	Stage B5 Part 2 – Final	Considering ways of mitigating adverse effects and maximising beneficial effects

	Proposals	
		Analysis of SA findings and recommendations
	Stage C	Preparing the Sustainability Appraisal Report
Aug 2014	Stage C1	Preparing the SA Report
	Stage D	Consulting on the Final Proposals (Publication) document and SA Report
Sept 2014	Stage D1	Public participation on the Publication Document and the SA Report
Nov 2014	Stage D2(i)	Appraising significant changes
Feb 2015	Stage D2(ii)	Appraising significant changes resulting from representations (following Examination and receipt of Inspectors report)
	Stage D3	Making decisions and providing information
		Prepare Sustainability Statement as part of Adoption Statement
	Stage E	Monitoring implementation of the plan
	Stage E1	Finalising aims and methods for monitoring
	Stage E2	Responding to adverse effects

This report effectively summarises progress and findings for stage B1 – B6 (Part 1) of the Sustainability Appraisal process. The appraisal process will identify and recommend options as well as changes that could improve policy development and its potential impacts. The changes suggested are expected to be considered through drafting of the Schools DPD Final Proposals document. The appraisal of the Final Proposals document will commence in summer 2014.

5. Compliance with the SEA Directive/Regulations

Strategic Environmental Assessment is derived from European Directive 2001/42/EC and concentrates on the environmental aspects of a plan. As noted earlier in this report, Sustainability Appraisal is a requirement of Section 39(2) of the Planning and

Compulsory Purchase Act 2004 and encompasses social and economic considerations, as well as the environmental factors considered by Strategic Environmental Assessment.

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

Table 2 ‘Strategic Environmental Assessment Directive Requirements’ indicates where the particular requirements of Strategic Environmental Assessments are addressed within the body of this document and in previous or future reporting.

Table 2 – SEA Directive Requirements

SEA Directive Requirements	Where the requirements have been addressed
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	This report, and through commentary reports accompanying each iteration of the DPD.
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section ‘Introduction’ above.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section ‘Task A2: Review of Baseline Data’ of the Local Plan Scoping Report (May 2013)
c) The environmental characteristics of areas likely to be significantly affected;	Section ‘Task A2: Review of Baseline Data’ of the Local Plan Scoping Report (May 2013)

<p>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</p>	<p>Sections 'Task A1 & A2 and Appendices 1 & 2 of the Local Plan Scoping Report (May 2013)</p>
<p>e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the ways those objectives and any environmental considerations have been taken into account during its preparation;</p>	<p>Section 'Task A1' & 'Appendix 1' of the Local Plan Scoping Report (May 2013)</p>
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climate factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects could include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<p>This report, and through Commentary Reports accompanying each iteration of the DPD.</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>This report, and through Commentary Reports accompanying each iteration of the DPD.</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Sections 9 & 14, and through Commentary Reports accompanying each iteration of the DPD.</p>

i) A description of the measures envisaged concerning monitoring in accordance with Article 10;	Final SA report
j) A non-technical summary of the information provided under the above headings.	Non technical version of each report.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	This report.
<p>Consultation:</p> <ol style="list-style-type: none"> 1. Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental (Art. 5.4). 2. Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2). 3. Other EU Member states, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7). 	<ol style="list-style-type: none"> 1. SA Scoping Report, May 2013 2. Iterative SA Reporting Programme published for public consultation and sent to Statutory consultees, (including this report) 3. N/A
Taking the environmental report and the results of the	Addressed in each iteration of the Development Plan

consultations into account in decision making (Art. 8)	Document.
<p>Provision of information on the decision: When the plan or programme is adopted, the public and any countries consulted under Art. 7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> - The plan or programme as adopted; - A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the options expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in light of the other reasonable alternatives dealt with; and - The measures decided concerning monitoring (Art. 9 and 10). 	To be addressed at a later stage in the process.
Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)	To be addressed at a later stage in the process.

6. Habitat Regulations Assessment

As part of the SA process, a screening assessment must be undertaken to determine whether or not there is a need to undertake a Habitat Directive Assessment (HDA), also known as an Appropriate Assessment (AA). This is in accordance with Article 6(3) and

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

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

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

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

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

The Council undertook and published a Screening Assessment of its Core Strategy in February 2011. This assessment concluded that there would be no likely significant effects as a result of the Council's strategy as detailed in the Core Strategy, and accordingly stages 2 & 3 of the HRA (the full Appropriate Assessment) were not required. In light of further advice from Natural England in respect of the Council's Development Management DPD and Sites DPD, the Council are of the view that undertaking a separate HRA for the Schools DPD would be unnecessary, as this document gives effect to the Core Strategy. Accordingly the conclusions drawn in respect of the HRA for the Core Strategy are also applicable here.

7. Consultation

As required by the Strategic Environmental Assessment (SEA) Directive (Article 6(2)), the SA Scoping Report was referred to the Consultation Bodies with environmental responsibilities, (Natural England, English Heritage, and the Environment Agency), in May 2013.

Comments were received in response to this consultation. These responses resulted in a number of changes to the SA framework for the Development Plan Documents. This input has been particularly useful in updating baseline data and in refining the SA Framework. In particular the indicators identified for SA objective 3 'Historic Environment' have been updated.

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

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

Following public consultation, responses will be reflected through later versions of the DPD.

8. The Sustainability Appraisal Framework

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

The SA Scoping Report for Local Plans, issued for consultation in May 2013, identified environmental, social and economic objectives contained in other relevant plans, policies and programmes, and baseline information on environmental, social and economic characteristics of the Borough. The review of plans and programmes of relevance to the Development Plan Document and the collection of baseline information helps to identify the issues which the DPD need to address and enabled a robust

appraisal of their significant effects. The Scoping Report also identified key sustainability issues affecting the borough and sets out the framework for the SA including objectives, criteria and indicators.

The SA objectives set out in Table 3 below were developed in response to the key sustainability issues identified through the scoping process.

Table 3 –SA Objectives

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

17	Support sustainable economic growth	Economic
18	Improve opportunities for education and training	Social/Economic
19	Promote cultural and community identity	Social

9. DPD Objective Appraisals (Stage B1)

The first stage in the appraisal process involves testing the DPD objectives against the SA Framework.

The primary objectives of the Schools DPD are defined in table 4 below:

Table 4 – Planning for Schools DPD Objectives

Schools DPD Objectives	
1	To ensure the amount of primary and secondary school places provided meets the needs of the borough
2	To provide safe, convenient and accessible locations for primary and secondary schools
3	To promote good design and space standards for schools

To ensure the DPD objectives, which structure the content of the Schools DPD, are in accordance with sustainability principles, the DPD objectives are tested against the SA objectives by way of compatibility matrices set out in table 5 below. Where compatibility issues or contradictions have been identified, consideration has been given to the need to refine the DPD objectives to minimise such conflicts.

Table 5 – DPD Objectives Appraisal Matrix

Key	
✓	Compatible
x	Incompatible
?	Possible conflict
0	No links

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

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

Commentary on Objectives Appraisal Matrix		
DPD Objective		Comments
1	To ensure the amount of primary and secondary school places provided meets the needs of the borough	Satisfying demand for new schools will be key to ensuring that fair access exists for all to this and other essential facilities. An increase in facilities in line with demand is also likely to increase educational attainment. Inevitably as with most new developments, accommodating such need unless carefully sited, planned and managed could place pressure on the existing environment, and may conflict with existing uses/designations, particularly where new provision is competing with scarce resources in terms of land. Potential areas of conflict include the need to resort to building on existing open space, employment sites, areas of flood risk, or where it may impact on existing heritage assets.
2	To provide safe, convenient and accessible locations for primary and secondary schools	Providing new facilities in safe, convenient and accessible location supports a number of sustainability objectives. These include for example, reducing vehicular dependency. As noted above in respect of the first objective, in order to accommodate new facilities in accessible locations, this may however involve compromising other policy designations.
3	To promote good design and space standards for schools	This objective supports a number of sustainability objectives. Whilst the achievement of high quality standards for the

		school itself are important, in developing these design principles consideration also needs to be given to the relationship with adjoining uses.
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The results in table 5 indicate that the objectives are broadly sustainable, although some uncertainties still exist as further detail regarding the implementation of these objectives is unclear at this stage in the appraisal. Moreover, when considered collectively the objectives complement one another and reduce some of these uncertainties.

10. Identification of Options (Stage B2)

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

The draft issues and options paper identifies a range of alternative options. These options take one of two forms.

The first set of options relate to the overall approach to the plan. Three alternative options are identified as follow:

- A- Do nothing
- B- Expand existing schools on primary and secondary sites
- C- Identify new sites

The second set of options effectively take the form of the sites themselves. A total of 25 sites have been identified in the long list. Only a proportion of these sites will ultimately be needed in the plan, and the SA process will be a key tool to assist in determining which sites should be included in the short list/final list. Other sites may also be identified through the process and these will need to be similarly appraised.

11. Appraisal Methodology

The appraisal of the Schools DPD Issues and Options against the Council’s Sustainability Framework has been conducted using matrices, whereby the impact of the proposal against the Council’s objectives is scored using the key detailed in Table 6 below.

Table 6 – Options Appraisal Matrices: Key

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

The options appraisal matrices set out the results of the appraisal of the individual options against each of the 19 SA objectives. For the sites the appraisal matrices have been adapted grouping the SA objectives into the three main tenants of sustainability, i.e. environmental, social and economic, and the results are presented as such. As part of this process, consideration has also been given to the need for mitigation of negative effects. Mitigation can take a wide range of forms including:

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

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

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

12. Strategic Flood Risk Assessment

The Council published a Strategic Flood Risk Assessment in 2008. This document supplements the Environment Agency's own flood zone data, refining information on the probability of flooding, considers all sources of flooding in the borough and takes into account the impact of climate change, . The data collected as part of the SFRA, is key to the appraisal of site options in the Schools document allowing a sequential test to be undertaken for sites which are particularly vulnerable to flood risk because of their locality in areas of high flood risk probability.

The requirement to undertake a sequential test is established in the NPPF. The NPPF indicates that the sequential test should be applied when allocating land for development. This is therefore particularly relevant to the preparation of DPD's which allocate sites. The overall aim of the sequential test is to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, the local planning authority should consider reasonably available sites in Flood Zone 2, taking into account the flood risk vulnerability of land uses, and apply the Exception Test as requirement. Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required. In Ealing the application of the sequential test is normally undertaken as part of the wider SA process. Fortunately a large proportion of Ealing is located within zone 1 (low probability) in terms of fluvial (river) flood risk, with only the River Brent being the significant source of fluvial flood risk in the borough (which itself is already protected through various open space designations). Accordingly, the number of sites which are identified in the schools

DPD which fall within zones 2 or 3a/3b are small. The table below summarises the findings of the sequential test for each of these sites, and will inform the inclusion and development of sites in future iterations of the plan. As the plan is still in early stages of preparation (issues and options), it should be noted that the list of sites identified in the plan at present is likely to exceed that needed, and accordingly this list will be refined down through the process. Accordingly a full exception text would only be required in the event that the Council were proposing to take forward one of these higher risk sites.

For the purpose of this exercise according to the flood risk vulnerability classification outlined in the Technical Guidance to the National Planning Policy Framework, schools are classified as 'More Vulnerable' uses. 'More Vulnerable' uses are normally considered to be appropriate uses in zones 1 & 2, and are only permitted in zone 3 subject to passing the exception test.

Table 7 - Sites with significant flood risk

	Sites Identified for Potential Future School Development	Flood Zones (based on latest EA data)	Actual Risk <i>The risk that has been estimated based on a qualitative assessment of the performance capability of the existing flood defences</i> <i>(see Volume 2, Appendix D of SFRA)</i>	Residual Risk <i>Flood risks resulting from an event more severe than for which particular flood defences have been designed to provide protection.</i> <i>(see Volume 2, Appendix D of SFRA)</i>	Other sources of flood risk <i>(see Figures ii and iii, Appendix D of SFRA for summary mapping, and Volume 2 for more detailed mapping, and EA data)</i>	Additional comments/recommendations
S-ACT4	Twyford Abbey	The northern section of the site adjoining the A406 is located within flood zone 2. The very north east corner is located in zone 3a. Part of the site is in an EA Flood Warning Area.	The very north east corner of the site is identified as an area of actual risk – 1 in 100 year defended along with 1 in 100 year with 20% climate change.	The north east corner of the site is identified as an area of residual risk – 1 in 1000 year undefended.	No risk of sewer flooding identified. Site includes areas of low and medium ground water risk. Sections of the site are also susceptible to surface water flooding.	The site is sufficiently large to avoid needing to locate new built development within the north east corner of the site and the majority of any new development could be accommodated within that part of the site which is defined as zone 1.
S-ACT5	St Alban's Church	The whole site is located within flood zone 3a.	None identified	None identified	The site is in an area of medium ground water risk. The site is within an area where 2 properties were flooded by surface water sewers, 4 properties by foul water sewers and 8 properties from combined sewers (1997-2007).	Whilst the whole site does fall within flood zone 3a, actual risk data indicates that there is low probability of this based on the performance capability of existing flood defences. Moreover Hammersmith and Fulham's Level 2 SFRA indicates that there is no risk to this site during a breach event. If appropriate an FRA specific Breach Analysis could be carried out.

13. Uncertainties, Limitations and Assumptions

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

- In a number of cases, indicators have been identified despite there being no baseline data currently available with which to establish trends or measure effects. It was not always possible to predict effects on the basis of qualitative data.
- There is a risk that officers may make their own assumptions about the possible effects arising from a particular option. However, consultation on the SA report is seen as adding value in allowing other 'experts' and interested stakeholders to review the effects identified.
- A lack of further detail regarding the implementation of specific proposals (particularly for sites) can result in a great deal of uncertainty when predicting effects.
- The approach taken to appraising sites has involved grouping the SA objectives into the three tenants of sustainability. As will be evident from the commentary in the matrices grouping the objectives in this way requires an on balance view to be taken regarding overall sustainability, as the performance of option against individual SA objectives may vary within that grouping.
- Difficulties have been identified in respect of predicting the impact of the DPD in the long term, which has further complicated the process of accurately appraising the sustainability of the document.
- Difficulties associated with and distinguishing between and separating out the influence of the DPD from other external factors. For example whilst the predicted trends for a particular baseline indicator may suggest that the situation is worsening over time, possibly because of various factors beyond the control of the DPD, the DPD itself may still have a positive influence.

14. Sustainability Appraisal Matrices for the Schools Issues & Options

The matrices analyse the sustainability of the Schools DPD Issues and Options Document. The full list of headlines and recommendations drawn from the matrices can be found in the following chapters. As noted above these take one of two forms covering both the overall plan option and site options.

Overall Plan Options

Schools DPD Issues & Options Appraisal: Issue 1																			
Housing	Sustainability Objectives																		
Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Issue 1: How do we meet the identified need for school places?																			
(a) Do nothing	-	-	?/+	NI	NI	NI	NI	+	+	NI	NI	?/+	-	NI	-	--	NI	--	NI
(b) Expand existing schools	+	+	?	NI	-	NI	NI	?/-	?/-	?/-	?/-	?/-	++	NI	?	++	NI	+	+
(c) Identify new sites	++	++	?/-	NI	?	NI	NI	?/--	?--	?/-	?/+	?/-	++	NI	+	++	?/-	++	++

Commentary

As is evident from the findings detailed in the table above, at this stage in options development, there is still a great deal of uncertainty as detail is lacking regarding the implementation of each of the options. Despite this uncertainty, certain assumptions can be made allowing a comparison between the three options in respect of their relative sustainability as follows:

Option A 'do nothing' in failing to satisfy demand performs poorly against a number of SA objectives notably 1, 16 & 18. If the status quo were maintained the situation is also likely to worsen as demand increases overtime. A lack of school places in the borough would lead to larger commuting for both primary and secondary age pupils within the borough, and would not facilitate fair access to educational opportunities. The 'do nothing' option is however possibly the least resource intensive option.

Option B 'expand existing schools' would in contrast to option A contribute towards meeting demand and in this regard performs well against SA objectives 13, 16 & 18. Accommodating need around existing schools however may not address existing spatial deficiencies in access and similar unsustainable movements could remain. The process of expansion can also be potentially disruptive to existing pupils, and as a result may temporarily impact on the quality of education on offer.

Option C 'identify new sites' similarly performs well against objectives 1, 16 & 18, although is likely to be the most resource intensive of the three options, requiring additional land take to accommodate new facilities. As with most new development this is likely to place pressure on other land uses including specifically open space and employment areas. Whilst the net loss of such space would be contrary to various SA objectives, such development can sometimes also enable necessary improvements to such space, however this impact can only be fully understood as further detail is developed regarding the implementation of individual site options.

Recommended Option and any suggested amendments:

Option A in failing to satisfy demand is not sustainable, nor is it a realistic scenario given the statutory requirement to plan for need. Whilst option B would contribute to meeting need, it is unlikely by itself to fully satisfy demand. Moreover it would fail to redress existing spatial deficiencies in access to school facilities. Whilst option C has the potential to meet this need, it is potentially the most resource intensive option in terms of land take. The most sustainable option is likely to be a combination of options B & C. It is recommended that option B is prioritised first, where the expansion of schools addresses existing spatial deficiencies. This will need to be considered on an individual site by site level with regard to existing and projected need. Whilst existing sites should make an important contribution it is recognised that by themselves they are unlikely to fully satisfy demand, or redress all spatial deficiencies. Accordingly the identification of new sites will likely be necessary. The sites appraisal of new sites will assist in determining which sites are most sustainable.

Site Options

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-ACT1 265 and 239 Horn Lane, Acton W3	-	++	-	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss of employment use 	Zone 1 (low risk)	
	<ul style="list-style-type: none"> • Introducing a sensitive use could give rise to noise and vibration issues due to proximity of railway. Crossrail will likely increase these impacts too. • Potential air quality issues arising because of proximity to Horn Lane, and neighbouring industrial uses. • Relatively low PTAL levels (2), although reasonable connections (Acton Mainline/bus services) supporting sustainable modes of travel, and proposed primary provision is likely to draw on smaller catchment. • The proposal may support the remediation of contaminated land. • Limited access to outdoor space in the area which could result in placing additional pressure on nearby open space if full provision is not accommodated within the site. 	<ul style="list-style-type: none"> • New primary provision provides for an essential local facility in an area of demand. • Supports opportunities for education for local residents. 	<ul style="list-style-type: none"> • Development would involve the loss of employment/commercial use (although non-designated site). • Although new school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-ACT2 Acton Park Depot. Acton, W3	-	++	+	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss – open space (POS/MOL), although of limited functional value 	Zone 1 (low risk)	<ul style="list-style-type: none"> • Potential use of adjoining park land for school use should be explored • Given the MOL setting, school buildings should be designed to be sympathetic to the open character of the site. Consideration should be given to utilising the existing built footprint.
	<ul style="list-style-type: none"> • The proposal would result in the loss of designated open space (POS/MOL) although it is noted that this site is not currently in recreation use, essentially operating as a depot. The site at present already contains a number of buildings and is largely covered in hardstanding. • it would be difficult to accommodate outdoor play facilities on-site given its size. A School would potentially need to rely on nearby open space (possibly Acton Park) in an area with low park to population ratio, placing additional pressure on such areas. • Introducing a sensitive use could give rise to potential noise and vibration issues due to proximity of railway. • Good public transport accessibility (PTAL 3/4) supports sustainable modes of travel. <p>Moreover as a proposed primary school site, it is likely to draw on smaller catchment.</p>	<ul style="list-style-type: none"> • New primary provision provides essential local facilities in an area of demand. • Supports opportunities for education for local residents. 	<ul style="list-style-type: none"> • New school provision key to securing an educated workforce in the future 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-ACT3 Eastman Road, (Acton Park Industrial Estate), Acton W3	-	+	--	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss of employment and industrial land 	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> • Proximity to neighbouring industrial uses is likely to give rise to air quality and noise issues. • Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space. • The proposal may support the remediation of contaminated land. • Reasonable public transport accessibility (PTAL 3), supporting use of sustainable modes of transport. 	<ul style="list-style-type: none"> • Provides essential local facilities in an area of demand. • Improves opportunities for education and training for local residents. • Potentially hostile environment for a school. 	<ul style="list-style-type: none"> • Loss of local significant industrial site (LSIS), affecting supply of space in the borough. • The proposed use may also undermine/prejudice the operation of existing neighbouring industrial uses. • New school provision key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-ACT4 Twyford Abbey, Twyford Abbey Road, Acton NW10	-	+	+	<ul style="list-style-type: none"> ● Gain - Provision of a new school ● Loss – MOL/Heritage Land/SINC, although could facilitate improvements in public access. 	Flood zone 2 (in part – north section adjoining A406) and flood zone 3 (north east section). NB. Parts of site are also susceptible to surface water flooding.	<ul style="list-style-type: none"> ● The proposed development should seek to maximise the use of existing footprints where possible. ● Given the MOL setting, school buildings should be designed to be sympathetic to the open character of the site. ● Community access to open facilities should be secured. ● New built development should be directed to areas of site of lowest flood risk.
	<ul style="list-style-type: none"> ● Potential loss of Loss of open space (MOL/Heritage Land/SINC), although potential to access public access to site is positive. ● Proposal may enable the reuse and renovation of underutilised building of heritage value (on register at risk). ● The close proximity to the A406 could create noise/air quality concerns. ● Low public transport accessibility (PTAL 1b/2), limits opportunities for sustainable movement. ● The proposal may involve introducing vulnerable uses into an area of flood risk. 	<ul style="list-style-type: none"> ● New school provides essential local facilities in an area of demand. ● Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> ● New school provision will be key to securing an educated workforce in the future. ● The cost of renovating listing building may be prohibitively expensive or necessitate an over development of the site which would conflict with other SA objectives. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-ACT5 Park Royal, Southern Gateway, Acton W3	+	+	-	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss – employment/commercial uses 	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding	<ul style="list-style-type: none"> • Given the severity of open space deficiency in the area, any proposals should secure the on-site provision of playing fields.
	<ul style="list-style-type: none"> • Good public transport accessibility (PTAL 4) supports sustainable modes of travel. • Proximity to A40 is likely to give rise to noise/air quality concerns. • Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space. • The proposal may secure new open space provision (with dual use for the community) in area of severe deficiency. 	<ul style="list-style-type: none"> • New school provision provides essential local facilities in an area of demand. • Improves opportunities for education and training for local residents. • Potentially hostile environment for a school. A40 / Gipsy corner – road safety issues. 	<ul style="list-style-type: none"> • Development would give to the loss of employment/commercial use (part SIL). • New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-ACT6 St Albans Church, South parade, Acton W4	+	++	+	<ul style="list-style-type: none"> Gain - Provision of additional capacity 	Flood zone 3	
	<ul style="list-style-type: none"> Proposal may enable the reuse and renovation of underutilised building (of heritage value?). Good public transport accessibility (PTAL 4) supports sustainable modes of travel. Although proposed as an extension, it would be difficult to accommodate outdoor play facilities on-site given its size. A School would potentially need to rely on nearby open space, placing additional pressure on these areas. Site is located within an area of high flood risk, although probability of event occurring is low as dependent on breach of Thames Barrier. 	<ul style="list-style-type: none"> New capacity provides essential local facilities in an area of demand. Supports opportunities for education and training for local residents. 	<ul style="list-style-type: none"> New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL1 49-69 Uxbridge Road, Ealing W5	+	+	-	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss – commercial uses 	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> • Proposal may enable the enhancement of existing building and more efficient use of site. • Excellent public transport accessibility (PTAL 5) and town centre location supports sustainable modes of travel. • Unless outdoor play provision can be accommodated on site, a school would potentially need to rely on nearby open space, in an area with low park to population ratio, placing additional pressure on these areas. 	<ul style="list-style-type: none"> • New school provision provides for essential local facilities in an area of great demand. • Improves opportunities for education and training for local residents. • Improved layout and design may enhance the Conservation area. 	<ul style="list-style-type: none"> • Development would involve the loss of employment/commercial use (office corridor). • New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL2 91-113 Uxbridge Road, Ealing, W5	+	+	?	<ul style="list-style-type: none"> ● Gain - Provision of a new school ● Loss – potential loss of commercial uses 	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> ● Proposal may enable the enhancement of existing buildings and more efficient use of site. ● Very good public transport accessibility (PTAL 4) and town centre location supports sustainable modes of travel. ● Unless outdoor play provision can be accommodated on site, a school would potentially need to rely on nearby open space, in an area of low park to population ratio, placing additional pressure on these areas. 	<ul style="list-style-type: none"> ● New school provision provides for essential local facilities in an area of great demand. ● Improves opportunities for education and training for local residents. ● Improved layout and design may enhance the Conservation area. 	<ul style="list-style-type: none"> ● Dependent on siting within site, proposal may result in a loss of employment uses (note office corridor location). It should be noted that a D (education) class use was operational on part of the site previously. ● New school provision key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL3 Craven House, Bilton House and land to rear of Cavalier House, Ealing W5	+	+	-	<ul style="list-style-type: none"> ● Gain - Provision of a new school ● Loss – potential loss of commercial uses 	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> ● Proposal may enable the enhancement of existing buildings and more efficient use of site. ● Very good public transport accessibility (PTAL 3,4 & 5) and town centre location supports sustainable modes of travel. ● Unless outdoor play provision can be accommodated on site, a school would potentially need to rely on nearby open space, in an area with low park to population ratio, placing additional pressure on these areas. 	<ul style="list-style-type: none"> ● New school provision provides for essential local facilities in an area of great demand. ● Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> ● Development would involve the loss of employment/commercial use (office corridor). ● New school provision key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL4 Former Barclays sports ground, Park View Road, Ealing W5	--	++	+	<ul style="list-style-type: none"> ● Gain - Provision of a new school ● Loss – MOL, although could potential improvements in public access. 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> ● The proposed development should seek to maximise the use of existing built footprint where possible. ● Given the MOL setting, school buildings should be designed to be sympathetic to the open character of the site. ● Community access to open facilities should be secured.
	<ul style="list-style-type: none"> ● Proposal would likely result in the loss of designated open space (MOL) and impact on open setting, although proposal offers potential to enhance community access to open space facilities on the site. ● Low public transport accessibility (PTAL 1/2), limits opportunities for sustainable modes of travel, and is likely to encourage car use. 	<ul style="list-style-type: none"> ● New school provision provides for essential local facilities in an area of great demand. ● Improves opportunities for education and training for local residents. ● Opportunity to enhance community access to space. 	<ul style="list-style-type: none"> ● New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL5 Former BT Telephone Exchange, Castle House and Rome House, Gordon Road, West Ealing, W13	-	+	-	<ul style="list-style-type: none"> Gain - Provision of a new school Loss – employment uses 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> Possible scope for a mixed use development – residential and education. Opportunities to enhance the relationship to the green corridor should be explored further.
	<ul style="list-style-type: none"> Dependent on siting within site, introducing a sensitive use could give rise to potential noise and vibration issues due to proximity of railway. Proposal may enable the enhancement of existing building and more efficient use of site. Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage. Reasonable public transport accessibility (PTAL 2/3), although good local connections supporting sustainable modes of travel. Site sufficiently large to accommodate outdoor space within site reducing dependency on nearby open space. 	<ul style="list-style-type: none"> New school provision essential local facilities in an area of great demand. Improves opportunities for education and training for local residents. General improvements to Ealing as a town centre and place to live through removal of vacant and overbearing employment building within a residential area. 	<ul style="list-style-type: none"> Development would involve the loss of employment use (although vacant at present and a non-designated site). New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL6 Former King Fahad Academy, Little Ealing Lane, W5	+	++	+	<ul style="list-style-type: none"> Gain - Provision of a new school School site is vacant 	Flood zone 1 (low risk). A small section of the site is susceptible to surface water flooding.	
	<ul style="list-style-type: none"> Proposal may enable the enhancement of existing building and more efficient use of site. School infrastructure and outdoor space already in place. Reasonable PTAL levels (2/3), although good local connections supporting sustainable modes of travel. 	<ul style="list-style-type: none"> Provides essential local facilities. Great demand for primary and secondary schools in the area. Improves opportunities for education and training for local residents. In residential area. Retention of school use is advocated. 	<ul style="list-style-type: none"> New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL7 Lamerton, 23-25 High Street, 7-11 New Broadway, Sandringham Mews, Ealing W5	++	++	--	<ul style="list-style-type: none"> • Gain - Provision of a new school • Potential loss of retail units • Loss of surface level car park 	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding (intermediate risk).	<ul style="list-style-type: none"> • Opportunities should be maximised to incorporate SUDS, and minimise extent of hardstanding.
	<ul style="list-style-type: none"> • Proposal may enable the enhancement of existing building and more efficient use of site. • Excellent public transport accessibility (PTAL 6a) and town centre location supports sustainable modes of travel. • Unless playing fields can be accommodated on site, a school would potentially need to rely on nearby open space, placing additional pressure on these areas • Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage. 	<ul style="list-style-type: none"> • Provides essential local facilities in an area of great demand. • Improves opportunities for education and training for local residents. • Improved layout and design may enhance the Conservation area. • Improvements to the layout will eliminate deadzones and reduce the fear of crime associated with existing backland areas/car park. 	<ul style="list-style-type: none"> • Loss of commercial uses, including retail parade. • New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL8 Orion Park, Northfields Avenue West Ealing, W13	-	++	-	<ul style="list-style-type: none"> Gain - Provision of a new school Loss of employment uses 	Flood zone 1 (low risk).	
	<ul style="list-style-type: none"> Introducing a sensitive use may give rise to potential noise and vibration issues due to proximity of railway. Reasonable public transport accessibility (PTAL 2/3), although good local connections (Station opposite & bus services nearby) supporting sustainable modes of travel. Unless playing fields can be accommodated on site, the school would potentially need to rely on nearby open space, placing additional pressure on these areas. Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage. 	<ul style="list-style-type: none"> The proposal would provide essential local facilities. Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> Development would give rise to the loss of employment use (non-designated). New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-EAL9 Perceval House carpark 14-16 Uxbridge, Ealing W5	+	+	+	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss of surface level car park 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> • Opportunities to enhance the relationship to the green corridor should be explored further, including promoting use of green walls/roofs.
	<ul style="list-style-type: none"> • Introducing a sensitive use may give rise to potential noise and vibration issues due to proximity of railway. • Proposal would enable a more efficient use of site. • Excellent public transport accessibility (PTAL 5/6a) and town centre location supports sustainable modes of travel. • Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage. 	<ul style="list-style-type: none"> • New capacity provides essential local facilities in an area of great demand. • Improves opportunities for education and training for local residents. • Opportunity for site to accommodate new housing development may be lost. 	<ul style="list-style-type: none"> • New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-GNP1 Phoenix Trading Estate, Bilton Road, Perivale UB6	+	++	-	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss of employment/Industrial uses (non-designated) 	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding (Less Susceptible).	
	<ul style="list-style-type: none"> • Proposal would enable a more efficient use of site. • Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space. • Low public transport accessibility (PTAL 2/3), limits opportunities for sustainable modes of travel, and is likely to encourage car use. 	<ul style="list-style-type: none"> • New school provision provides for essential local facilities. • Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> • Development would involve the loss of employment/industrial use (non-designated). • New school provision key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-GNP2 Site in front of Greenford High School, Ruislip Road, Greenford UB6	-	++	+	<ul style="list-style-type: none"> • Gain - Provision of a new school • loss of playing fields 	Flood zone 1 (low risk). Small part of the site is susceptible to surface water flooding.	
	<ul style="list-style-type: none"> • Proposal would enable more efficient use of space, although note loss of playing fields • Reasonable PTAL levels (3), supporting sustainable modes of travel. • Increase in hard surfacing is likely to be detrimental in terms of drainage. 	<ul style="list-style-type: none"> • New capacity provides for essential local facilities. • Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> • New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-GNP3 Ealing Education Centre, Mansell Road, Greenford UB6	+	?	?	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss of training facilities 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> • Any new school development should facilitate dual use of space for wider community use.
	<ul style="list-style-type: none"> • Proposal may enable the enhancement of existing building. • Good public transport accessibility (PTAL 4) supports sustainable modes of travel. • it would be difficult to accommodate outdoor play facilities on-site given its size. A School would potentially need to rely on nearby open space, placing additional pressure on these areas. Although potential to share the outdoor space with other nearby schools. 	<ul style="list-style-type: none"> • Whilst the proposal would provide essential local facilities in the form of a school, meeting the needs of certain elements of the population, it would entail the loss of the existing community training centre. To off-set this loss there is potential for the shared use of space. 	<ul style="list-style-type: none"> • New school provision key to securing an educated workforce in the future, although note potential loss of existing training accommodation. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-HAN1 Eversheds Sports Ground, Hanwell W7	--	++	+	<ul style="list-style-type: none"> • Gain - Provision of a new school capacity • Loss of MOL and community open space 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> • Dual use of open space • Given the MOL setting, school buildings should be designed to be sympathetic to the open setting, and their footprint minimised.
	<ul style="list-style-type: none"> • Proposal would likely result in the loss of designated open space (MOL/COS) and impact on open setting, although proposal offers potential to enhance community access to open space facilities on the site. The site at present does already accommodate buildings and is covered in part with hardstanding. • Low public transport accessibility (PTAL 1b/2), limits opportunities for sustainable modes of travel, and is likely to encourage car use. Although noted that proposal is for school extension rather than new school, and so will likely serve existing catchment. 	<ul style="list-style-type: none"> • Additional capacity provides for essential local facilities in an area of great demand. • Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> • New school provision will be key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-HAN2 Trumpers Way, Hanwell W7	-	+	--	<ul style="list-style-type: none"> ● Gain - Provision of a new school ● Loss of employment and industrial land (designated) 	Flood zone 1 (low risk)	
	<ul style="list-style-type: none"> ● Introducing a sensitive use may give rise to potential noise and vibration issues due to proximity of neighbouring industrial / employment uses. ● Low public transport accessibility (PTAL 1a), limits opportunities for sustainable modes of travel, and is likely to encourage car use. Although noted that proposal is for school extension rather than new school, and so will likely serve existing catchment. 	<ul style="list-style-type: none"> ● Additional capacity provides for essential local facilities in an area of great demand. ● Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> ● Loss of locally significant industrial site (LSIS), affecting supply of such space. ● The proposed use may undermine/prejudice the operation of existing neighbouring industrial uses, and impact on their contribution to the economy. ● New school provision key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-HAN3 Wickes 83-101 Boston Road, Hanwell W7	+	++	-	<ul style="list-style-type: none"> Gain - Provision of a new school Loss of retail use 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> Consider retention of existing retail function alongside new school.
	<ul style="list-style-type: none"> Proposal would enable more efficient use of space. Low PTAL (2), although located within town centre, supporting sustainable modes of travel. Unless playing fields can be accommodated on site, the school would potentially need to rely on nearby open space, placing additional pressure on these areas. Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage. 	<ul style="list-style-type: none"> New school provision provides essential local facilities in an area of great demand. Supports opportunities for education and training for local residents. Improvements to the layout could potentially eliminate deadzones and improve the integration of the site with nearby residential areas. 	<ul style="list-style-type: none"> Loss of retail use (primary frontage) New school provision key to securing an educated workforce in the future 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-HAN4 42 Lower Boston Road, Hanwell W7	-	+	+	<ul style="list-style-type: none"> Gain - Provision of a new school 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> Any new school development should facilitate dual use of space for wider community use. Careful consideration needs to be given to impact on trees on site (many of which are covered by TPOs).
	<ul style="list-style-type: none"> Reasonable public transport accessibility (PTAL 2/3), although in close proximity to town centre supporting sustainable modes of travel. It would be difficult to accommodate outdoor play facilities on-site given its size. A school would potentially need to rely on nearby open space, placing additional pressure on these areas. 	<ul style="list-style-type: none"> Provides essential local facilities in an area of great demand, although may result in loss of study centre?/health centre? (community facility). Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> New school provision key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-SOU1 Southall East – The Arches, The Limes Middlesex Business Centre and Charles House Merrick Road / Bridge Road, Southall UB2	+	++	-	<ul style="list-style-type: none"> Gain - Provision of a new school Loss of employment uses (non-designated) 	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding.	<ul style="list-style-type: none"> Proposal would need to preserve/be sympathetic to existing buildings of heritage value.
	<ul style="list-style-type: none"> Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space. Proposal may enable the enhancement of existing building and more efficient use of site. Currently the site is isolated due to the railway and road infrastructure. PTAL levels vary across the site (1a, 1b, 2 & 3). Wider regeneration opportunities across the whole site may improve the accessibility of the site and promote sustainable modes of transport. Dependent on siting of school within site there may be potential noise and vibration issues due to proximity of railway. 	<ul style="list-style-type: none"> Provides essential local facilities for new population, as part of wider regeneration scheme. Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> Development would involve the loss of employment/industrial use (non-designated), although release of land has already been agreed having considered contribution to overall supply of industrial stock. New school provision key to securing an educated workforce in the future. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-SOU2 Park Avenue, Southall UB1	+	++	+	<ul style="list-style-type: none"> • Gain - Provision of a new school • Loss of employment uses (non-designated) • Potential loss of biodiversity value 	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding.	<ul style="list-style-type: none"> • Careful consideration would need to be given to the nature conservation value of the site.
	<ul style="list-style-type: none"> • Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space. • Dependent on siting of new school within site, it may impact on nature conservation value of site. • Proposal may enable the enhancement of existing building and more efficient use of site. • Dependent on location of school within site there may be potential noise and vibration issues due to proximity of railway. • PTAL levels vary across the site (1b, 2 & 3). Access to sustainable modes of transport will be dependent on siting of new school. • Dependent on siting of school within site there may be potential noise and vibration issues due to proximity of railway. 	<ul style="list-style-type: none"> • Provides essential local facilities for new population, as part of wider regeneration scheme. • Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> • Development would involve the loss of employment/industrial use (non-designated), although release of land has already been considered and approved. • However as part of mixed use development it could support economic growth and promote local employment opportunities, training and skills attainment. 			

Site Name	Performance of Sites (options) against SA Objectives			Will there be any loss or gain of facilities, assets or services?	SFRA (EA) Flood Zone	Comments, Mitigation measures, scope for enhancement or alternative uses).
	Environmental	Social	Economic			
S-SOU3 Southall West (Southall Gas Works), The Straight, Southall, UB1	+	++	+	<ul style="list-style-type: none"> Gain - Provision of a new school 	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> The proposal as part of wider regeneration scheme would support the reuse/remediation of vacant (contaminated) land. Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space. New open space is also proposed as part of wider regeneration scheme. Currently the site is very isolated due to the railway and road infrastructure. PTAL levels vary across the site (0, 1a, 1b & 2). Wider regeneration opportunities across the whole site may however improve the accessibility of the site and promote sustainable modes of transport. 	<ul style="list-style-type: none"> Provides essential local facilities for new population, as part of wider regeneration scheme. Improves opportunities for education and training for local residents. 	<ul style="list-style-type: none"> As part of mixed use development it could support economic growth and promote local employment opportunities, training and skills attainment. 			

15. Headline Findings and Recommendations

At this stage in the preparation of the Local Plan, the SA can steer the development proposals towards the most sustainable approach, and highlight where negative impacts might be avoided altogether, or mitigated.

As noted above the options take one of two forms. The first set of options appraised related to the overall approach to the plan. Three alternative options were appraised. Option A 'do nothing' in failing to satisfy demand was considered to be the least sustainable, and also the least realistic scenario. Whilst option B 'expand existing schools' and option C 'identify new sites' were considered to be more sustainable, each present their own unique sustainability issues. Ultimately it was determined that a combination of options B & C may well offer the most sustainable scenario as it would be able to share the best elements of the two options. Those aspects of sustainability where the options performed less well, could be managed through the choice of site, or the detailed design of individual sites which would be informed by the results of the site appraisal at a later stage.

With regard to sites as only a single 'use' option is proposed, i.e. the development of additional school capacity (albeit this can take a variety of forms), many of the sites perform identically against a number of the SA objectives. The 'alternatives' therefore take the form of the choice between the sites themselves. Accordingly in completing the appraisal, consideration was given to the relative performance of the sites. As we are dealing with individual sites, each with unique characteristics/issues it would be of limited value attempting to draw general conclusions as to their overall sustainability when considered collectively, and so reference instead should be made to the commentary for each site in the matrices.

Moreover the proposed nature of many of the site proposals (at Issues and Options stage), means that it is somewhat problematic to draw firm conclusions. Often the detail of a proposal is required in order to realistically test the full potential impacts upon a specific SA objective. For this reason, the impact of a large degree of proposals against certain SA objectives is assessed as 'uncertain'.

Some common themes have however emerged regarding proposed mitigation/enhancement measures which are summarised as follows.

- Where sites comprise or adjoin open space (MOL/POS/SINC etc.), careful consideration should be given to the design of the building to minimise impact on the open character/setting of the area. Where built form already exists on such sites, careful consideration should be given to maximising the utilization of the existing built footprint.
- Where need is demonstrated opportunities should be taken to facilitate enhanced community access to open space facilities as part of development proposals.
- On site play provision should be sought for all school developments, and in particular prioritised in areas of open space deficiency.
- Opportunities should be maximised to incorporate SUDS and to minimise the extent of hardstanding.
- Opportunities should be taken to facilitate shared use of school space for community access.
- Where a site lies within a number of flood zones, any potential building footprint should be directed to those parts of the site at lowest risk (i.e. zone 1).
- Careful consideration should be given to the siting, design & layout of proposals to minimise exposure to noise/air pollution.
- Proposals involving the loss of employment uses should evidence lack of need to retain site in such use.
- Consideration should be given to developing and incorporating design policies/guidance in future iterations of the plan to cover sustainable design & construction principles (i.e. the application BREEAM Education), and accessible design (see Building Bulletin 94: Inclusive School Design).

17. Future Work / Next Steps

The next stage (B3-B5, Part 2) in the SA process will be to undertake an appraisal of the Final Proposals due to be published for consultation in September 2014.

Appendices

Appendix 1 – SA Objectives Appraisal Matrix

1							
2	✓						
3	?	✓					
4	✓	✓	?				
5	0	0	?	0			
6	✓	✓	?	✓	✓		
7	✓	✓	0	0	✓	✓	

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

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

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

Key

- ✓ = Compatible
- × = Incompatible
- ? = Uncertain (see end notes)
- 0 = No links

Notes regarding compatibility of SA objectives:

- ⁱ Ensuring access and inclusion for all without causing harm to the historic environment will require careful attention to design
- ⁱⁱ Designing out crime without causing harm to the historic environment will require careful attention to design
- ⁱⁱⁱ This objective is likely to lead to new development; this may increase and/or improve the available public open space in the borough, however, it may also result in a conflict where public open space is at risk from development.
- ^{iv} When ensuring access for all, with potential development of new facilities, the need to protect the natural environment must be taken into account.
- ^v This objective is likely to lead to new development, which may result in increased pressure on the natural environment and potential loss of habitat, this illustrates the conflict inherent in delivering the principles of sustainable development.
- ^{vi} An increase in housing and consequent population increase is likely to lead to increased air pollution from vehicles and domestic energy use, however, sustainable design and construction of new development and/or improvements to existing dwellings may help to reduce air pollution.
- ^{vii} Adaptations to the effects of climate change and measures to reduce contributions to climate change may harm the historic environment and will require careful design.
- ^{viii} This policy is likely to lead to new development; this may help to address and adapt to climate change through the use of sustainable design and construction techniques, but if numbers of dwellings increase, it is likely to lead to increased contributions to climate change and increased water usage and flood risk overall.
- ^{ix} Any new development potentially resulting from this objective must take into account the requirement to conserve water resources and prevent flooding.
- ^x The local economy is likely to benefit from the attractive, historic local environment but conflict may arise due to requirements for new business development where this may impact upon the historic character of the borough.
- ^{xi} Economic growth is likely to lead to development; this must be carefully designed and located to avoid impacting on water quality, water resources or flood risk.
- ^{xii} The incorporation of noise mitigation measures could potentially be prevented, where these require physical works that may be considered unsympathetic in terms of the historic fabric of the building.
- ^{xiii} Improvements in access to essential facilities could reduce the need to travel and therefore contribute to improvements in air quality.
- ^{xiv} The incorporation of air quality mitigation measures could potentially be prevented, where these require physical work that may be considered unsympathetic in terms of the historic fabric of the building.

Appendix 2 – SA Framework

Proposed Local Plan SA Objective	Criteria	Indicator
1. Actively support inclusive access to essential health, community and local services.	Will services be provided to a broad section of the community, e.g. youth/elderly?	Community centres providing youth activities.
		Number of accessible libraries.
		Percentage of local authority buildings accessible by disabled people.
	Will it improve the quality and integration of health services?	Number of health centres with 3 or more disciplines.
	Will it ensure that essential services are accessible to those without access to a car?	Number of GP surgeries in the borough.
		Number of opticians in the borough.
		Number of dental surgeries in the borough
		Access to other key services – No indicator identified
Will it improve the satisfaction of residents with their neighbourhood as a place to live?	Not identified - Survey of residents' satisfaction to be undertaken shortly.	
2. Promote community involvement, voluntary and partnership working.	Will increase community participation in activities and the democratic process?	Percentage of people voting in Elections.

Proposed Local Plan SA Objective	Criteria	Indicator
		Percentage of adults surveyed (in 2002) who feel they can influence decisions in their local area a) individually b) by working together
3. Preserve and enhance the local historic environment and cultural heritage.	Will it promote partnership working?	Not identified
	Will it protect/enhance the historic environment?	The number of heritage assets on the English Heritage's Heritage at Risk Register The number of Conservation Areas which have up to date CAA/CAMPs.
	Will it protect the quality of designated historic landscapes and townscapes?	Number of Heritage Land/Registered Historic Garden Designations. Number of local and strategic viewpoints, views and landmarks in the borough.
	Will it preserve and record archaeological features?	Number of archaeology priority areas. Number and percentage of archaeological sites at risk.
4. Reduce crime, fear of crime and antisocial behaviour.	Will it reduce actual levels of crime?	Overall crime rate Index of Multiple Deprivation 2004 by Super Output Area – Crime (Rank 1 = most deprived, 32,482 = least deprived). Total notifiable offences (per 1000 households).

Proposed Local Plan SA Objective	Criteria	Indicator
		Crime survey: burglary/burglary from dwelling (per 1000 households).
	Will it reduce the fear/perception of crime?	Theft of/from motor vehicles (per 1000 households). Perception/fear of crime – no indicator identified.
5. Minimise detrimental noise impacts.	Will ambient (environmental/industrial) noise levels be reduced?	Number of noise complaints received by LBE Environmental Health Department for different categories of noise.
	Will it reduce vehicular traffic noise?	Percentage of borough exposed to noise levels above 60dB(A) in the day.
	Will it reduce the impact of air traffic noise?	Percentage of borough exposed to noise levels above 60dB(A) at night
	Will it reduce perceived noise levels?	No indicator identified
	Will it promote best practice in terms of noise minimisation and attenuation in design?	No indicator identified
	Will it promote the appropriate siting of development which minimises the potential for conflict with incompatible uses?	Number/percentage of housing completions which are affordable.
6. Improve access to well designed, affordable, inclusive and appropriately located housing.	Will it improve the affordability of housing?	Affordable Housing Ratio (house price/earnings affordability)(2006)
	Will it improve the availability of housing?	Total number of housing completions
		Housing Tenure mix

Proposed Local Plan SA Objective	Criteria	Indicator
		Time on housing waiting list
		Number of people sleeping rough on a single night.
		Percentage of Local Authority homes which were non-decent
		Unfit Homes per 1000 dwellings (AMR)
	Will it improve the physical accessibility of housing?	Percentage of homes built which are Wheelchair Accessible.
		Percentage of homes built which are built to Lifetime Home Standards.
7. Reduce health inequalities and promote healthy living.	Will it reduce health inequalities?	Life expectancy
	Will it reduce death rates?	Standardised Mortality Rate
		Percentage of population in good health.
	Will it improve access to health facilities?	Number of GP surgeries
		Number of NHS dentists
		Number of opticians
	Will it improve healthy living?	Accessibility to sports/recreation facilities.

Proposed Local Plan SA Objective	Criteria	Indicator
8. Protect and enhance public open space	Will it protect open space?	Area of protected open space.
		Gains or loss in open space (loss of designated open space to development) (AMR – Permissions and Completions data)
	Will it enhance the quality of open/green space?	Satisfaction with open space in the borough (Percentage of residents satisfied with the borough's open space)
9. Protect and enhance the natural environment and biodiversity	Will it conserve and enhance existing habitats of importance (notably designated sites)?	Total area of Sites of Metropolitan or Local Importance for Nature Conservation (SMLINCs).
		The number/area of Local Nature Reserves.
		Number/area of Local Nature management areas in the borough
		Gains or loss of open space designated for its nature conservation value (AMR – Permissions and Completions data).
		Number/area and type of BAP Priority Species and Habitats.
		The achievement of BAP targets

Proposed Local Plan SA Objective	Criteria	Indicator
	Will the biodiversity value of watercourses and their associated corridors be protected and enhanced?	<p>Percentage of main rivers and canals recorded as good or fair quality (This indicator relates to water quality and not biodiversity).</p> <p>The length of naturalised green buffer zones for wildlife next to watercourses created.</p> <p>The number of developments providing buffer zones along watercourses</p>
	Will it create new habitats (therefore increasing biodiversity)?	<p>The number or area of habitats created</p> <p>The number of developments providing ecological enhancements</p>
10. Improve Air Quality	Will it improve air quality?	Extent of air quality management area(s)
	Will it help to achieve the objectives of the Air Quality Management Plan?	The number of days when air quality is moderate or high
	Will it reduce the need to travel by private car?	Method of travel to work and education
	Will it encourage freight transfer from road to rail and water?	Not identified
11. Reduce contributions to and vulnerability to climate change	Will it lead to an increase proportion of energy needs being met from renewables?	Proportion of energy supplied from renewable sources
		The number of planning applications where equipment for renewable power generation has been secured (AMR).

Proposed Local Plan SA Objective	Criteria	Indicator
	Will it encourage cleaner modes of transport?	Method of travel to work and education.
	Will it reduce greenhouse gas emissions?	CO ² emissions by end user.
		CO ² emissions by sector.
	Will it reduce energy demand?	Energy efficiency – the average SAP rating of local authority owned dwellings The number of developments incorporating energy efficient techniques such as green roofs etc
12. Improve water quality, conserve water resources and minimise the impact of flooding.	Will it encourage sustainable water supply and consumption	Groundwater storage (Thames Water)
		Surface reservoir storage
	Will it reduce water consumption?	(Thames Water)
		(Three Valleys Water)
		Water consumption per household.
		Water consumption in non-domestic developments.
	The overall water consumption in the borough per capita.	
The number of developments incorporating water conservation techniques.		
Will it reduce flood risk?	The number of planning applications granted which are contrary to the advice of the Environment Agency on either flood defence grounds or water quality	
	The number of properties or the area of developed land at risk from flooding	

Proposed Local Plan SA Objective	Criteria	Indicator
		<p>The number of planning applications incorporating sustainable urban drainage systems (SUDS).</p> <p>Or the number or percentage of new developments which have met the following criteria:</p> <ul style="list-style-type: none"> a) Control the quantity of surface water runoff from new development (discharge rates restricted to Greenfield including 1 in 100 year on-site attenuation) b) Improve the quality of runoff c) Enhance nature conservation, landscape and amenity value of site.
	Will it improve water quality in the borough?	<p>Percentage of main rivers and canals recorded as good or fair quality in terms of</p> <ul style="list-style-type: none"> (a) biological quality (b) chemical quality
13. Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings.	Will it ensure that new development occurs on derelict, vacant and underused previously developed land?	<p>Percentage of new homes built on previously developed land</p> <p>Gains or loss in open space (loss of designated open space to development)(AMR)</p>
	Will it encourage the reuse of vacant or underutilised buildings?	<p>Vacancy Rates (EDS)</p> <p>Vacancy Rates of Major Employment Locations</p> <p>Vacancy rates of retail units within town centres (Ealing Town Centre Health Checks)</p>
	Will it enhance soil quality/address contamination issues?	Percentage of new homes built on previously developed land

Proposed Local Plan SA Objective	Criteria	Indicator
14. Reduce waste generation and increase waste recycling.	Will it reduce overall household waste generation?	Number of kilograms of household waste collected per head
	Will it increase recycling levels?	Percentage of the total tonnage of waste arising, which have been recycled (Municipal only) (AMR) Household (Total Tonnage)
	Will it reduce commercial and industrial waste?	Total waste arisings (non-municipal). Data not yet available.
15. Reduce vehicular dependency and promote the use of sustainable modes of transport	Will it reduce the use of the private car?	Mode of travel used by Ealing residents to visit nearest town centres. Car ownership levels - Households with access to 1 or more car(s)/van(s)
	Will it increase the proportion of journeys being made by public transport?	
	Will it generate investment for improvement in transport infrastructure?	Amount of Section 106 funding secured for transport improvements (AMR).
16. Promote local employment opportunities, training and skills attainment.	Will it improve employment rates/reduce unemployment levels?	Unemployment rate (Census)
	Will it create local paid employment opportunities?	New Firms: Registrations – Enterprise: VAT registrations per 10,000 adults.
		Percentage Annual Change in VAT registered stocks at year end
	Will it promote local employment opportunities through new business establishment?	Inward investment (EDS)
Will it increase employment opportunities for all groups, including those most in need?	Unemployment rate – Ward level data (Census)	
	Employment rate by ethnicity (EDS)	

Proposed Local Plan SA Objective	Criteria	Indicator
	Will it improve earning levels?	Annual Earnings – Average Household Income (including benefits) (EDS)
	Will it improve skills attainment?	Skills Level: Percentage of working age population qualified to degree level or higher (EDS)
17. Support Sustainable Economic growth.	Will it encourage new business start ups?	New Firms: Registrations – Enterprise: VAT registrations per 10,000 adults
		Vacancy rate (EDS)
	Will it encourage inward investment?	New Firms: Registrations – Enterprise: VAT registrations per 10,000 adults
		Organisations which support new and established businesses
	Will it ensure that there is a sufficient supply of employment/industrial space?	Distribution of Industrial/Warehousing floorspace in West London (EDS)
Change in employment floorspace – Permissions and Completions data (AMR)		

Proposed Local Plan SA Objective	Criteria	Indicator
		Vacancy rate of Major Employment Locations (EDS)
	Will it support the formation of local supply chains for goods and services?	Organisations which support new and established businesses
18. Improve opportunities for education and training	Will it improve the qualifications and skills of the population	Literacy and numeracy of 11 year olds (Neighbourhood Renewal Project)
		Literacy and numeracy of 14 year olds (Neighbourhood Renewal Project)
		Educational Attainment - % of 15 year old pupils in school maintained by the local authority achieving 5 or more GCSE's at grades A*-C or equivalent (BVPI)
		Educational Attainment - % of 19 year olds with 2 qualifications and above (EDS)
		Skills Level: % of working age population qualified to degree level or higher (EDS)
		Number of pupils with English as an additional language (DFES)
	Will it improve access to educational facilities?	Number of educational institutions in the borough

Proposed Local Plan SA Objective	Criteria	Indicator
19. Promote cultural and community identity	Will it foster a sense of pride in the area?	Percentage of people surveyed who think that their local area is a place where people from different backgrounds can live together harmoniously.
	Will it encourage engagement in community activities?	Membership (numbers (2002)) of the main community networks (Ealing Community Network, BME forum and Refugee Forum).
		Number of people (2002) volunteering through the volunteer bureau

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