Introduction

This document forms a non-technical/executive summary of the sustainability appraisal commentary report into the Issues and Options paper for the Schools Development Plan Document. A non technical executive summary version is produced in line with the requirements of the Strategic Environmental Assessment Directive. This report also serves to aid accessibility to what is a lengthy technical document. Under the Planning and Compulsory Purchase Act 2004, Local Planning Authorities are required to undertake a sustainability appraisal (SA) of all Local Plan documents.

The Schools DPD when completed will comprise site specific allocations and accompanying policies to manage future school provision in the borough. The Document will complement the Development Strategy, Development Management and Development Sites documents. When approved it will become a statutory Development Plan Document (DPD) forming part of the Local Plan for Ealing.

Methodology

The preparation of the sustainability appraisal of the schools DPD has involved the following key stages to date:

- The production of a Scoping Report, which provides the framework for the appraisal of any Plan which the Council is required to undertake.
- Completing the appraisal of the Issues and Options paper, and reporting on findings (through the main technical report and this executive summary).
**Scoping**

The Scoping Report sets the context and provides baseline information in order to provide a starting point from which to appraise the effects of implementing a plan. To provide a sound basis for analysis, the report reviews the relevant plans and programmes which may influence a plan; identifies the key sustainability issues and problems; and details a Sustainability Framework through which the appraisal can take place.

The SA Framework allows sustainability effects to be described, analysed and compared, and is therefore central to the SA process. The Framework comprises sustainability objectives, which are expressed in terms of criteria (decision making criteria), the achievement of which are measurable using indicators. These indicators are supported by baseline data, which is essential for predicting and evaluating the effect of the DPD. Nineteen sustainability objectives are identified as follows:

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

Reduce vehicular dependency and promote the use of sustainable modes of transport  
Environmental

Promote local employment opportunities, training and skills attainment  
Economic

Support sustainable economic growth  
Economic

Improve opportunities for education and training  
Social/Economic

Promote cultural and community identity  
Social

**Appraising Options**

The initial stage of plan preparation involves the development and consideration of alternative options for policy development. For the Schools DPD 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 follows.

A – Do nothing  
B – Expand existing stock  
C – Identify new sites

The second set of options take the form of sites. A total of 25 sites have been identified in the Long List as part of the Issues and Options document.

Each of these options has been appraised against the SA objectives and conclusions have been drawn as to their relative sustainability. Whilst the SA process isn’t the sole decision making tool when choosing between options, it is an important one and careful consideration is given to its findings when refining and developing the plan. Particular regard should be given to any mitigation measures identified through the SA which seek to prevent, reduce or offset significant effects or to maximise beneficial impacts.
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 they 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 set out in the main technical report.

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, 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 maximized to incorporate sustainable drainage and 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.
• 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).

**Future Work / Next Steps**

The next stage in the SA process will be to undertake an appraisal of the Final Proposals published for consultation in September 2014.