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# 1. Introduction

This report is the Final Sustainability Appraisal Report of the Planning for Schools Development Plan Document (hereon referred to as the 'Schools DPD') Final Proposals. A Non-Technical Executive Summary version has been produced alongside this report, in line with requirements of the Strategic Environmental Assessment Directive. This serves to aid accessibility to what is a lengthy technical document.

The Schools DPD will provide site specific allocations and accompanying policies for future school provision in the borough. The Schools DPD 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 environmental, economic and social factors. Furthermore the National Planning Practice Guidance states that a sustainability appraisal's role is to promote sustainable development by assessing the

extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

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.

This report follows on from the previous commentary report covering the SA of the Schools DPD Issues and Options, published in October 2013. This report utilises the established framework, providing a sustainability commentary on the Schools DPD Final Proposals, published for consultation in February 2015. As it is intended that the publication draft of the DPD will form the basis of

the submission draft, this report should be read as the 'Final' SA report. Accordingly this report draws together the complete picture of the evolution of the Schools DPD.

## 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 Part 1 – Issues & Options	Predicting the effects of the DPD based on Issues and Options
Sept 2013	Stage B4 Part 1 – Issues and Options	Evaluating the effects of the DPD based on Issues and Options

Sept 2013	Stage B5 Part 1 – Issues & Options	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.
July 2014		Developing the Final Proposals (Publication), with consideration of findings from SA of Issues and Options
Jan 2015	Stage B3 Part 2 – Final Proposals	Predicting the effects of the DPD based on the Publication Version
Jan 2015	Stage B4 Part 2 – Final Proposals	Evaluating the effects of the DPD based on the Publication Version
Jan 2015	Stage B5 Part 2 – Final Proposals	Considering ways of mitigating adverse effects and maximising beneficial effects
		Analysis of SA findings and recommendations
	Stage C	Preparing the Sustainability Appraisal Report
Jan-Feb 2015	Stage C1	Preparing the SA Report
	Stage D	Consulting on the Final Proposals (Publication) document and SA Report
Feb 2015	Stage D1	Public participation on the Publication Document and the SA Report
Apr 2015	Stage D2(i)	Appraising significant changes
Jun-Jul 2015	Stage	Appraising significant changes resulting from representations (following Examination and receipt of

	D2(ii)	Inspectors report), and updating Final SA report as necessary
Date TBC	Stage D3	Making decisions and providing information
Date TBC		Prepare Sustainability Statement as part of Adoption Statement
	Stage E	Monitoring implementation of the plan
Date TBC	Stage E1	Finalising aims and methods for monitoring
Date TBC	Stage E2	Responding to adverse effects

This report effectively completes stage C of the process. Should significant changes arise post publication, including during the examination, these will need to be appraised and the Final SA report updated accordingly.

## 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**

<b>SEA Directive Requirements</b>	<b>Where the requirements have been addressed</b>
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)
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Sections 'Task A1 & A2 and Appendices 1 & 2 of the Local Plan Scoping Report (May 2013)
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	Section 'Task A1' & 'Appendix 1' of the Local Plan Scoping Report (May 2013)

during its preparation;	
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);	This report, and through Commentary Reports accompanying each iteration of the DPD.
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;	This report, and through Commentary Reports accompanying each iteration of the DPD.
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;	Sections 9 & 14, and through Commentary Reports accompanying each iteration of the DPD.
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	This report.

<p>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).</p>	
<p>Consultation:</p> <ol style="list-style-type: none"> <li>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).</li> <li>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).</li> <li>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).</li> </ol>	<ol style="list-style-type: none"> <li>1. SA Scoping Report, May 2013</li> <li>2. Iterative SA Reporting Programme published for public consultation and sent to Statutory consultees, (including this report)</li> <li>3. N/A</li> </ol>
<p>Taking the environmental report and the results of the consultations into account in decision making (Art. 8)</p>	<p>Addressed in each iteration of the Development Plan Document.</p>
<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"> <li>- The plan or programme as adopted;</li> <li>- A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to</li> </ul>	<p>To be addressed at a later stage in the process.</p>

<p>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</p> <ul style="list-style-type: none"> <li>- The measures decided concerning monitoring (Art. 9 and 10).</li> </ul>	
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Art. 10)</p>	<p>To be addressed at a later stage in the process.</p>

## 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 likely to be applicable here, although advice is being sought separately from Natural England.

## **7. Consultation**

As required by the Strategic Environmental Assessment (SEA) Directive (Article 6(2)), the SA Scoping Report for Local Plans 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; however there were no responses in regards to the Sustainability Appraisal of the Options identified.

This report accompanies the Schools DPD, Publication 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 the Submission version of the Schools 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 Appraisal (Stage B1)<sup>1</sup>

The first stage in the appraisal process involved 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 were tested against the SA objectives by way of compatibility matrices set out in table 5 below. Where compatibility issues or contradictions were identified, consideration was given to the need to refine the DPD objectives to minimise such conflicts.

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<sup>1</sup> This stage was summarised previously in the October 2013 SA report, and so is included here to provide a full record of the process

**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	✓	✓

Schools DPD Objectives	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 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	✓

The table below provides further analysis and justification with regards to each Schools DPD Objectives performance against the various Sustainability Appraisal Objectives.

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.

The results in table 5 indicate that the objectives were broadly sustainable, although at the time of undertaking this appraisal some uncertainties did exist as further detail regarding the implementation of these objectives was unavailable. Moreover, when considered collectively the objectives were considered to complement one another and reduce some of these uncertainties.

## 10. Identification of Options (Stage B2)<sup>2</sup>

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 issues and options paper published in October 2013 identified a range of alternative options. These options took one of two forms.

The first set of options related to the overall approach to the plan. Three alternative options were 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 were identified in the long list.

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<sup>2</sup> This stage was summarised previously in the October 2013 SA report, and so is included here to provide a full record of the process

The long list of sites has now been refined, with the publication plan identifying 8 sites. The publication plan for the first time also introduces three policies. Following further analysis of the sites identified in the long list, 19 sites were removed. Either one or a combination of the following reasons led to sites being eliminated during the shortlisting process:

- Inability to deliver within required timescale
- Low PTAL levels
- Potential loss of open space or employment land
- Existing use of the site / alternative proposal or development has come forward
- Site location is not accessible from areas of greatest need

Since the long-list of sites was published at Issues and Options stage, some additional sites have been included for consideration where the opportunity has arisen and/or it is considered they have potential for use either as a new school or extension to existing school. Any sites added for consideration have been subject to the same short listing criteria as previously identified sites.

The Council has also indicated the proposed type of provision (as primary or secondary) on each site and commenced assessments of the potential FE that each short listed site could potentially deliver. In addition there have been changes to site boundaries on sites that were included in the long list of sites; any impact these boundary changes may have on the sustainability process will be reflected in the site options section of Chapter 14 – Sustainability Appraisal Matrices of the Publication Plan (Stage B3 & B4 – Part 2).

## **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 – Appraisal Matrices: Key**

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

The appraisal matrices set out the results of the appraisal of the individual options/sites/policies 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 (see section 15). 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/site/policy 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 DPD 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). Whilst two of the long list sites (Twyford Abbey and St Alban's Church) fell within flood zones 2 and 3, and were previously subjected to a sequential test (see October 2013 SA report), all of the sites in the final list are located within flood zone 1, and no further sequential testing is required.



## 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 of the Publication Plan (Stages B3 & B4 – Part 2)

The matrices below analyse the sustainability of the proposed policies and short list of sites in the Publication plan. The commentary on the next page provide further explanation, including where possible conflicts arise, and / or where the impact is difficult to appraise. The appraisal matrices and findings completed at the Issues and Options Stage (Stage B3 & B4 – Part 1) covering both the overall plan options and the long list of sites, are provided at appendix 1.

++	Major Positive	+	Minor Positive	NI	No Impact	-	Minor Negative	--	Major Negative	?	Uncertain
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### Policy Matrices

#### Schools DPD Policy 1 | Safeguarding of Allocated Sites

The sites allocated for school use in Table 1 (Planning for Schools DPD Site Shortlist of sites) will be safeguarded for school use.

Development for non-school uses will only be considered on land allocated in Table 1, if:

- a) Other uses are already envisaged as part of a mixed proposal incorporating a school; or
- b) It can be demonstrated that the site is surplus to requirements, and is no longer required for a school use.

*Current need in terms of number and location of school places is confirmed within the 'Demography, Projections and School Place Planning Methodology (Jan 2015)' background document. Due to the many variables affecting need, need may change over time and as such the Council will be regularly monitoring and updating need data, which will be available at [http://www.ealing.gov.uk/downloads/download/3461/planning\\_for\\_schools\\_dpd\\_publication\\_version-background\\_documentsPlanning](http://www.ealing.gov.uk/downloads/download/3461/planning_for_schools_dpd_publication_version-background_documentsPlanning). Whilst this policy protects allocated sites for educational use, it therefore also provides the opportunity to release allocated sites should it be agreed by the Council that they are no longer required.*

Schools DPD Final Proposals																				
		Sustainability Appraisal Objectives																		
Final Proposal		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Schools DPD Policy 1   Safeguarding of Allocated Sites.		++	+	?	NI	NI	?	NI	?	?	NI	?	?	++	NI	?	++	?/-	++	+
SA Objective	Score	Commentary																		
1	++	This policy performs strongly with regard to SA Objective 1: Actively support inclusive access to essential health, community and local services.																		
2	+	This policy helps the Council to achieve SA Objective 2: Promote community involvement, voluntary and partnership working.																		
3	?	At this stage of the plan process it is impossible to determine whether any school proposals would lead to a significant adverse impact on the local historic environment and cultural heritage. Only when individual design proposals have been brought forward for a site would this able to be assessed.																		
4	NI	The implementation of this policy would not result in any significant impact on SA Objective 4: Reduce crime, fear of crime and antisocial behaviour.																		
5	NI	The implementation of this policy would not result in any significant impact on SA Objective 5: Minimise detrimental noise impacts.																		
6	?	At this stage of the plan process we are unable to determine whether the implementation of this policy would have a significant adverse impact on the access to well-designed affordable, inclusive and appropriately located housing.																		
7	NI	The implementation of this policy would not result in any significant impact on SA Objective 7: Reduce health inequalities and promote healthy living.																		
8	?	It is uncertain whether the implementation of this policy would have either a positive or negative impact in regards to the protection and enhancement of open space. Although the policy safeguards allocated sites listed within the Planning for Schools DPD shortlist, the policy itself should not score either positively or negatively against this objective because the list of allocated sites is subject to change and the full extent of any impact against the objective can only be assessed in full once detailed design proposals have been brought forward for an individual site.																		
9	?	It is uncertain whether the implementation of this policy would have either a positive or negative impact in regards to the protection and enhancement of the natural environment and biodiversity. Although the policy safeguards allocated sites listed within the Planning for Schools DPD shortlist, the policy itself should not score either positively or negatively against this objective because the list of allocated sites is subject to change and the full extent of any impact against the objective can only be assessed in full once detailed design proposals have been brought forward for an individual site.																		
10	NI	The implementation of this policy would not result in any significant impact on SA Objective 10: Improve air quality.																		
11	?	There is a lack of certainty surrounding the effect school proposals on safeguarded sites would have on climate change and vulnerability to climate change. Firstly it is unknown the exact date these proposals would come forward and legislation and guidance is susceptible to change during that time period. Secondly the effect a proposal would have on climate change varies on a site by site basis, and whether or not mitigation measures are implemented falls under the responsibility of the developer.																		
12	?	It is uncertain whether the implementation of this policy would have either a positive or negative impact in regards to the improvement of water quality, conservation of water resources and minimising the impact of flooding. Although the policy safeguards the allocated sites in Planning for Schools DPD shortlist for school use, the severity of the subsequent impact on environmental objectives such as this is unknown at this stage in the plan process. There is also the potential for any proposals on allocated sites that come forward to improve existing conditions as well as mitigate any negative impacts resulting from the proposals.																		
13	++	This policy performs strongly with regard to SA Objective 13: Enhance existing buildings and facilities, and encourage the reuse / remediation of vacant land and under-utilised buildings.																		
14	NI	The implementation of this policy would not result in any significant impact on SA Objective 14: Reduce waste generation and increase waste recycling.																		
15	?	It is uncertain whether the implementation of this policy would have either a positive or negative impact in regards to vehicular dependency and promoting the use of sustainable modes																		

		of transport. Although the policy safeguards the allocated sites in Planning for Schools DPD shortlist for school use, whether or not vehicular dependency is reduced and sustainable modes of transport are promoted will depend upon the site being tested and what use is being proposed for that particular site.
16	++	This policy performs strongly with regard to SA Objective 16: Promote local employment opportunities, training and skills attainment.
17	?/-	It is uncertain whether the implementation of this policy would have either a positive or negative impact in regards to supporting sustainable economic growth. Although the policy safeguards the allocated sites in Planning for Schools DPD shortlist for school use, clauses a) and b) provide some flexibility to potentially allow proposals for other uses to come forward. Therefore the safeguarding of allocated sites may not necessarily prevent economic growth. Moreover school proposals would contribute to providing an educated workforce in the future which arguably in the long term could support sustainable economic growth.
18	++	This policy performs strongly with regard to SA Objective 18: Improve opportunities for education and training.
19	+	This policy helps the Council to achieve SA Objective 19: Promote cultural and community identity.

### Schools DPD Policy 2 | School Development Proposals

School Development Proposals on existing school sites and sites listed in Table 1 (Planning for Schools DPD Shortlist of sites) will generally be supported, provided that the proposals comply with the Development Plan for the area.

Primary or Secondary school development on other sites may be permitted if the proposals comply with the other Schools DPD policies, Ealing's adopted development plans and the Council's other statutory duties in respect of school places, and:

- a) It can be demonstrated that there is a shortfall in the schools capacity to meet current the need; and
- b) There is no adverse cumulative effect, when taken together with existing educational facilities, on the well-being of the local community, including any significant adverse impacts against the Schools DPD sustainability objectives.

*For planning applications for Primary or Secondary school use on sites other than those in Table 1, applicants will need to demonstrate to and satisfy the Council that the proposal meets an identified need in terms of size and location. Current need in terms of number and location of school places is confirmed within 'Demography, Projections and School Place Planning Methodology (Jan 2015)' background document. Need may change over time and as such the Council will be monitoring and updating need data, which will be available at [http://www.ealing.gov.uk/downloads/download/3461/planning\\_for\\_schools\\_dpd\\_publication\\_version-background\\_documentsPlanning](http://www.ealing.gov.uk/downloads/download/3461/planning_for_schools_dpd_publication_version-background_documentsPlanning).*

Schools DPD Final Proposals																			
Final Proposal	Sustainability Appraisal Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Schools DPD Policy 2   School Development Proposals.	++	+	NI	++	NI	NI	++	NI	++	+									

SA Objective	Score	Commentary
1	++	This policy performs strongly with regard to SA Objective 1: Actively support inclusive access to essential health, community and local services.
2	+	This policy helps the Council to achieve SA Objective 2: Promote community involvement, voluntary and partnership working.
3	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 3: Preserve and enhance the local historic environment and cultural heritage.
4	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 4: Reduce crime, fear of crime and antisocial behaviour.
5	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 5: Minimise detrimental noise impacts.
6	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 6: Improve access to well designed, affordable, inclusive and appropriately located housing.
7	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 7: Reduce health inequalities and promote healthy living.
8	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 8: Protect and Enhance open space.

9	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 9: Protect and enhance the natural environment and biodiversity.
10	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 10: Improve air quality.
11	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 11: Reduce contributions to and vulnerability to climate change.
12	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 12: Improve water quality, conserve water resources, and minimise the impact of flooding.
13	++	This policy performs strongly with regard to SA Objective 13: Enhance existing buildings and facilities, and encourage the reuse / remediation of vacant land and under-utilised buildings.
14	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 14: Reduce waste generation and increase waste recycling.
15	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 15: Reduce vehicular dependency and promote the use of sustainable modes of transport.
16	++	This policy performs strongly with regard to SA Objective 16: Promote local employment opportunities, training and skills attainment.
17	NI	Clause b) of the Planning for Schools DPD Policy 2 ensures Primary or Secondary school development on other sites may only be permitted when it is demonstrable that there are no significant adverse impacts against the Schools DPD sustainability objectives. Therefore the implementation of this policy would not result in any significant impact on SA Objective 17: Support sustainable economic growth.
18	++	This policy performs strongly with regard to SA Objective 18: Improve opportunities for education and training.
19	+	This policy helps the Council to achieve SA Objective 19: Promote cultural and community identity.

### **Schools DPD Policy 3 | National Planning Policy Framework: Presumption in Favour of Sustainable Development**

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

This policy follows the model policy endorsed through the National Planning Policy Framework. It would therefore be neither appropriate nor necessary to undertake a local assessment of this policy.

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## Site Option Matrices

Site Name and Ref	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			
<b>S-ACT2</b> <b>Acton Park Depot.</b> <b>Acton, W3</b>	-	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>Loss – open space (POS/MOL), although of limited functional value</li> </ul>	Zone 1 (low risk)	<ul style="list-style-type: none"> <li>Potential use of adjoining park land for school use should be explored</li> <li>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.</li> </ul>
	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Introducing a sensitive use could give rise to potential noise and vibration issues due to proximity of railway.</li> <li>Good public transport accessibility (PTAL 3/4) supports sustainable modes of travel.</li> </ul> <p>Moreover as a proposed primary school site, it is likely to draw on smaller (walking) catchment.</p>	<ul style="list-style-type: none"> <li>New primary provision provides essential local facilities in an area of demand.</li> <li>Supports opportunities for education for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision key to securing an educated workforce in the future</li> </ul>			

Site Name and Ref	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			
<b>S-EAL4</b>  <b>Former Barclays sports ground, Park View Road, Ealing W5</b>	--	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>Loss – MOL, although could result in potential improvements in public access to open space and community facilities.</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>The proposed development should seek to maximise the use of existing built footprint where possible.</li> <li>Given the MOL setting, school buildings should be designed to be sympathetic to the open character of the site.</li> <li>Community access to open facilities should be secured.</li> </ul>
	<ul style="list-style-type: none"> <li>Proposal would 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.</li> <li>Varied public transport accessibility (PTAL 1-4), depending on the access point for the site, may or may not support sustainable modes of transport. (PTAL 1b where existing building footprint lies).</li> </ul>	<ul style="list-style-type: none"> <li>New school provision provides for essential local facilities in an area of high demand.</li> <li>Improves opportunities for education and training for local residents.</li> <li>Opportunity to enhance community access to space.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision will be key to securing an educated workforce in the future.</li> </ul>			

Site Name and Ref	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			
<b>S-EAL6</b>  <b>Former King Fahad Academy, Little Ealing Lane, W5</b>	+	++	+	<ul style="list-style-type: none"> <li>• Gain – Re-provision of a school on the site</li> <li>• School site is vacant</li> </ul>	Flood zone 1 (low risk). A small section of the site is susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>• Proposal may enable the enhancement of existing building and more efficient use of site.</li> <li>• School infrastructure and outdoor space already in place.</li> <li>• Reasonable PTAL levels (2/3), although good local connections supporting sustainable modes of travel.</li> </ul>	<ul style="list-style-type: none"> <li>• Provides essential local facilities.</li> <li>• High demand for primary and secondary schools in the area.</li> <li>• Improves opportunities for education and training for local residents.</li> <li>• In residential area. Retention of school use is advocated.</li> </ul>	<ul style="list-style-type: none"> <li>• New school provision will be key to securing an educated workforce in the future.</li> </ul>			

Site Name and Ref	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			
<b>S-GNP2</b>  <b>Site in front of Greenford High School, Ruislip Road, Greenford UB6</b>	-	++	+	<ul style="list-style-type: none"> <li>● Gain - Provision of new school facilities.</li> <li>● Loss of vacant land formerly used as Car Park / temporary storage.</li> </ul>	Flood zone 1 (low risk). Small part of the site is susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>● Proposal would enable more efficient use of space.</li> <li>● Reasonable PTAL levels (3), supporting sustainable modes of travel.</li> <li>● Considering the large scale of development which has taken place on the site, any proposed development would result in a further reduction in the natural landscape. Therefore in isolation the proposal doesn't necessarily have a significant adverse impact on the environment, but cumulatively with previous development on the site, there is room to argue this could have a negative impact on the environment.</li> <li>● Potential adverse impacts with regards to noise, considering close proximity with Ruislip Road.</li> </ul>	<ul style="list-style-type: none"> <li>● New capacity provides for essential local facilities.</li> <li>● Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>● New school provision will be key to securing an educated workforce in the future.</li> </ul>			

Site Name and Ref	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			
<b>S-HAN1</b>  <b>Eversheds Sports Ground, Hanwell W7</b>	--	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school capacity</li> <li>Loss of MOL and community open space</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>Dual use of open space</li> <li>Given the MOL setting, school buildings should be designed to be sympathetic to the open setting, and their additional footprint minimised.</li> </ul>
	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Additional capacity provides for essential local facilities in an area of high demand.</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-HAN4</b>  <b>42 Lower Boston Road, Hanwell W7</b>	-	+	+	<ul style="list-style-type: none"> <li>Gain - Provision of additional primary school facilities.</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>Any school development should facilitate dual use of space for wider community use.</li> <li>Careful consideration needs to be given to impact on trees on site (many of which are covered by TPOs).</li> </ul>
	<ul style="list-style-type: none"> <li>Reasonable public transport accessibility (PTAL 2/3), although in close proximity to town centre supporting sustainable modes of travel. Although noted that proposal is for primary school extension rather than new school, and so will likely serve existing walking catchment.</li> <li>Potential to apply additional pressure on existing outdoor play facilities due to the increase in number of pupils.</li> </ul>	<ul style="list-style-type: none"> <li>Provides essential local facilities in an area of great demand, although loss of previous known use (study centre) and formerly proposed use (health centre / community facility).</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New provision of school facilities key to securing an educated workforce in the future.</li> </ul>			

Site Name and Ref	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			
<b>S-ACT7</b> <b>Land r/o Twyford School</b>	-	++	+	<ul style="list-style-type: none"> <li>Gain – Expansion of existing school facilities (Temporary).</li> <li>Loss of Community Open Space (part of Sports Ground).</li> </ul>	Flood zone 1 (low risk).	<ul style="list-style-type: none"> <li>Site has been included as contingency in the event that identified need will not be met on other site proposals.</li> </ul>
	<ul style="list-style-type: none"> <li>Proposal would result in the loss of Community Open Space. Although there is potential for the land to revert back to its original use.</li> <li>Good public transport accessibility (PTAL 5) supports sustainable modes of transport.</li> <li>Proposal would connect with existing school use on site.</li> <li>Potential impact on houses adjacent to the site boundary on Chatsworth Gardens with regards to noise.</li> </ul>	<ul style="list-style-type: none"> <li>Provides essential local facilities in area of high demand.</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>Provision of new school facilities will be key to securing an educated workforce in the future.</li> </ul>			

Site Name and Ref	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			
<b>S-ACT8</b>  <b>Acton College, Gunners-bury Lane, W3</b>	+	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>Loss of existing College Campus (1/3 in borough) / Higher Education facilities. Although note that other campus will absorb existing students as part of college consolidation plans.</li> </ul>	Flood zone 1 (low risk).	<ul style="list-style-type: none"> <li>Not only will the proposal improve opportunities for education and training for local residents but it will allow for a more efficient use of existing college buildings elsewhere in the borough.</li> </ul>
	<ul style="list-style-type: none"> <li>The existing buildings on the site already accommodate an educational use. Therefore the proposal would not result in any loss of open space.</li> <li>It would be difficult to accommodate outdoor play facilities on-site if the existing buildings were retained. A School would potentially need to rely on nearby open space.</li> <li>Excellent public transport accessibility (PTAL 5/6a) supports sustainable modes of travel.</li> </ul>	<ul style="list-style-type: none"> <li>Improves opportunities for education and training for local residents.</li> <li>Although existing higher education facilities will be lost, surplus provision on another campus within the borough will accommodate the existing students who attend the Acton campus. Therefore the proposal would result in a net gain of education provision within the borough.</li> </ul>	<ul style="list-style-type: none"> <li>As part of mixed use development it could support economic growth and promote local employment opportunities, training and skills attainment.</li> </ul>			

## 15. Headline Findings and Recommendations

### **Issues and Options and Long List of Sites (2013)**

As part of the SA process for the Planning for Schools DPD Issues and Options Paper, 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 presented 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.

The second set of options effectively took the form of the sites themselves. At this stage of the process site options comprised of a long list of 25 sites across the borough. Following the appraisal of the long list of sites, many performed identically against a number of the SA objectives. In addition there was uncertainty surrounding a large degree of proposals due to their nature, and lack of information with regards to individual site details. Common themes that emerged regarding proposed mitigation / enhancement measures (that don't overlap with those in the final report) are summarised as follows.

- Proposals involving the loss of employment uses should evidence lack of need to retain site in such use.
- 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).

### **Publication Plan – Final List of Sites and Policies (2015)**

The current Sustainability Appraisal report has appraised the DPD objectives, proposed policies to help guide development, and a short list of sites.

## Strengths

The combination of sites to be developed across the plan period will bring significant social benefits, along with opportunities for improving and enhancing under-utilised buildings / facilities, bringing vacant land back into use, and providing essential local facilities which will be pivotal to securing an educated workforce in the future to support sustainable economic growth. Whilst finer grain details are yet to be considered on site proposals, it is envisaged that development of the sites will contribute towards meeting the identified need for educational facilities as identified in the demography background report *'Demography, Projections and School Place Planning Methodology' (2015)*.

## Uncertainties

At this stage in the planning policy process, the SA can 'steer' development proposals towards the most sustainable approach, and highlight where negative impacts might be either avoided altogether, or mitigated. However, due to the provisional nature of the majority of site proposals, 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, and so reference instead should be made to the commentary for each site in the matrices set out in the site options matrices. For this reason, the impact Schools DPD Policy 1 has, on a number of sustainability objectives, have been assessed as 'uncertain'.

Specific uncertainties identified are as follows:

- Noise and vibration issues may arise on several school sites, due to noise from railways or other major transport corridors. It is not always clear how these will be dealt with, although it would be envisaged that such issues would be dealt with through the Development Management DPD.
- The extent to which school site proposals will have a significant adverse impact on the environment will depend on which sites school proposals are brought forward / implemented, and the individual design of specific development proposals. It would be envisaged that any significant adverse impact would be mitigated through the Development Management DPD when considering development proposals.

## Negative effects

The negative effects are limited at this stage; the aspirations for development of school sites are positive. The only area where potential negative effects can be envisaged is through environmental effects such as the loss of open space, anticipated increase in car use, reduction of the natural landscape, and additional pressure placed on nearby open space to accommodate outdoor play facilities. Whilst these issues have been identified for consideration, it would be envisaged that the following measures would be used to mitigate such effects:

- Where sites comprise or adjoin open space (MOL/COS/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 utilisation 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 new school development proposals, and in particular in areas of open space deficiency.
- Opportunities should be maximised to incorporate SUDS and to minimise the extent of hardstanding.
- Careful consideration should be given to the siting, design & layout of proposals to minimise exposure to air / noise pollution.
- Consideration should be given to developing and incorporating design policies / guidance in future iterations of the plan to cover sustainable design and construction principles (i.e the application BREEAM Education), and accessible design (see Building Bulletin 94: Inclusive School Design).

## 16. Mitigation & Monitoring Methods (Stage B5 & B6)

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

Mitigation measures can take a wide range of forms:

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

Mitigation measures referred to at previous stages have been taken into account, as far as possible in preparing this report:

- Policy within the Planning for Schools DPD requires development proposals to comply with the Local Plan which includes issues surrounding urban design, noise or air pollution for example.
- The formation of 'temporary' options for sites would allow any adverse effects on the environment to be reversed. (Assuming the site would return to its original state / use following the temporary time period).

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

are having the correct effect. In order for this to be possible however it will be dependent on ensuring that the baseline data is up to date and regularly reviewed.

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

It would be useful, as part of the Authorities Monitoring Report process, to develop sustainability performance indicators or sustainability best value indicators. Monitoring would also consider the cumulative / synergistic effects of the DPD in light of other Local Plan documents. Further details on the monitoring process are outlined in the Planning for Schools DPD Final Proposals.

## **17. Future Work / Next Steps**

The next stage in the SA process will be task D (Appraisal of significant changes). Should any significant changes arise post publication, and particularly through the examination process, these changes will need to be appraised, and the final SA report updated as necessary.

# Appendices

# **Appendix 1 – Sustainability Appraisal Matrices of the Issues and Options (Stages B3 & B4 – Part 1)**

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			
<b>S-ACT1</b>  <b>265 and 239 Horn Lane, Acton W3</b>	-	++	-	<ul style="list-style-type: none"> <li>● Gain - Provision of a new school</li> <li>● Loss of employment use</li> </ul>	Zone 1 (low risk)	
	<ul style="list-style-type: none"> <li>● Introducing a sensitive use could give rise to noise and vibration issues due to proximity of railway. Crossrail will likely increase these impacts too.</li> <li>● Potential air quality issues arising because of proximity to Horn Lane, and neighbouring industrial uses.</li> <li>● 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.</li> <li>● The proposal may support the remediation of contaminated land.</li> <li>● 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.</li> </ul>	<ul style="list-style-type: none"> <li>● New primary provision provides for an essential local facility in an area of demand.</li> <li>● Supports opportunities for education for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>● Development would involve the loss of employment/commercial use (although non-designated site).</li> <li>● Although new school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-ACT2</b>  <b>Acton Park Depot.</b> <b>Acton, W3</b>	-	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>Loss – open space (POS/MOL), although of limited functional value</li> </ul>	Zone 1 (low risk)	<ul style="list-style-type: none"> <li>Potential use of adjoining park land for school use should be explored</li> <li>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.</li> </ul>
	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>Introducing a sensitive use could give rise to potential noise and vibration issues due to proximity of railway.</li> <li>Good public transport accessibility (PTAL 3/4) supports sustainable modes of travel.</li> </ul> <p>Moreover as a proposed primary school site, it is likely to draw on smaller catchment.</p>	<ul style="list-style-type: none"> <li>New primary provision provides essential local facilities in an area of demand.</li> <li>Supports opportunities for education for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision key to securing an educated workforce in the future</li> </ul>			

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

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			
<b>S-ACT4</b>  <b>Twyford Abbey, Twyford Abbey Road, Acton NW10</b>	-	+	+	<ul style="list-style-type: none"> <li>• Gain - Provision of a new school</li> <li>• Loss – MOL/Heritage Land/SINC, although could facilitate improvements in public access.</li> </ul>	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"> <li>• The proposed development should seek to maximise the use of existing footprints where possible.</li> <li>• Given the MOL setting, school buildings should be designed to be sympathetic to the open character of the site.</li> <li>• Community access to open facilities should be secured.</li> <li>• New built development should be directed to areas of site of lowest flood risk.</li> </ul>
	<ul style="list-style-type: none"> <li>• Potential loss of Loss of open space (MOL/Heritage Land/SINC), although potential to access public access to site is positive.</li> <li>• Proposal may enable the reuse and renovation of underutilised building of heritage value (on register at risk).</li> <li>• The close proximity to the A406 could create noise/air quality concerns.</li> <li>• Low public transport accessibility (PTAL 1b/2), limits opportunities for sustainable movement.</li> <li>• The proposal may involve introducing vulnerable uses into an area of flood risk.</li> </ul>	<ul style="list-style-type: none"> <li>• New school provides essential local facilities in an area of demand.</li> <li>• Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>• New school provision will be key to securing an educated workforce in the future.</li> <li>• 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.</li> </ul>			

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

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			
<b>S-ACT6</b>  <b>St Albans Church, South parade, Acton W4</b>	+	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of additional capacity</li> </ul>	Flood zone 3	
	<ul style="list-style-type: none"> <li>Proposal may enable the reuse and renovation of underutilised building (of heritage value?).</li> <li>Good public transport accessibility (PTAL 4) supports sustainable modes of travel.</li> <li>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.</li> <li>Site is located within an area of high flood risk, although probability of event occurring is low as dependent on breach of Thames Barrier.</li> </ul>	<ul style="list-style-type: none"> <li>New capacity provides essential local facilities in an area of demand.</li> <li>Supports opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-EAL1</b>  <b>49-69 Uxbridge Road, Ealing W5</b>	+	+	-	<ul style="list-style-type: none"> <li>• Gain - Provision of a new school</li> <li>• Loss – commercial uses</li> </ul>	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>• Proposal may enable the enhancement of existing building and more efficient use of site.</li> <li>• Excellent public transport accessibility (PTAL 5) and town centre location supports sustainable modes of travel.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• New school provision provides for essential local facilities in an area of great demand.</li> <li>• Improves opportunities for education and training for local residents.</li> <li>• Improved layout and design may enhance the Conservation area.</li> </ul>	<ul style="list-style-type: none"> <li>• Development would involve the loss of employment/commercial use (office corridor).</li> <li>• New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-EAL2</b>  <b>91-113 Uxbridge Road, Ealing, W5</b>	+	+	?	<ul style="list-style-type: none"> <li>● Gain - Provision of a new school</li> <li>● Loss – potential loss of commercial uses</li> </ul>	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>● Proposal may enable the enhancement of existing buildings and more efficient use of site.</li> <li>● Very good public transport accessibility (PTAL 4) and town centre location supports sustainable modes of travel.</li> <li>● 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.</li> </ul>	<ul style="list-style-type: none"> <li>● New school provision provides for essential local facilities in an area of great demand.</li> <li>● Improves opportunities for education and training for local residents.</li> <li>● Improved layout and design may enhance the Conservation area.</li> </ul>	<ul style="list-style-type: none"> <li>● 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.</li> <li>● New school provision key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-EAL3</b>  <b>Craven House, Bilton House and land to rear of Cavalier House, Ealing W5</b>	+	+	-	<ul style="list-style-type: none"> <li>● Gain - Provision of a new school</li> <li>● Loss – potential loss of commercial uses</li> </ul>	Zone 1 (low risk). Small sections of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>● Proposal may enable the enhancement of existing buildings and more efficient use of site.</li> <li>● Very good public transport accessibility (PTAL 3,4 &amp; 5) and town centre location supports sustainable modes of travel.</li> <li>● 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.</li> </ul>	<ul style="list-style-type: none"> <li>● New school provision provides for essential local facilities in an area of great demand.</li> <li>● Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>● Development would involve the loss of employment/commercial use (office corridor).</li> <li>● New school provision key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-EAL4</b>  <b>Former Barclays sports ground, Park View Road, Ealing W5</b>	--	++	+	<ul style="list-style-type: none"> <li>● Gain - Provision of a new school</li> <li>● Loss – MOL, although could potential improvements in public access.</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>● The proposed development should seek to maximise the use of existing built footprint where possible.</li> <li>● Given the MOL setting, school buildings should be designed to be sympathetic to the open character of the site.</li> <li>● Community access to open facilities should be secured.</li> </ul>
	<ul style="list-style-type: none"> <li>● 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.</li> <li>● Low public transport accessibility (PTAL 1/2), limits opportunities for sustainable modes of travel, and is likely to encourage car use.</li> </ul>	<ul style="list-style-type: none"> <li>● New school provision provides for essential local facilities in an area of great demand.</li> <li>● Improves opportunities for education and training for local residents.</li> <li>● Opportunity to enhance community access to space.</li> </ul>	<ul style="list-style-type: none"> <li>● New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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

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			
<b>S-EAL6</b>  <b>Former King Fahad Academy, Little Ealing Lane, W5</b>	+	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>School site is vacant</li> </ul>	Flood zone 1 (low risk). A small section of the site is susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>Proposal may enable the enhancement of existing building and more efficient use of site.</li> <li>School infrastructure and outdoor space already in place.</li> <li>Reasonable PTAL levels (2/3), although good local connections supporting sustainable modes of travel.</li> </ul>	<ul style="list-style-type: none"> <li>Provides essential local facilities.</li> <li>Great demand for primary and secondary schools in the area.</li> <li>Improves opportunities for education and training for local residents.</li> <li>In residential area. Retention of school use is advocated.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-EAL7</b>  <b>Lamerton, 23-25 High Street, 7-11 New Broadway, Sandringham Mews, Ealing W5</b>	++	++	--	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>Potential loss of retail units</li> <li>Loss of surface level car park</li> </ul>	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding (intermediate risk).	<ul style="list-style-type: none"> <li>Opportunities should be maximised to incorporate SUDS, and minimise extent of hardstanding.</li> </ul>
	<ul style="list-style-type: none"> <li>Proposal may enable the enhancement of existing building and more efficient use of site.</li> <li>Excellent public transport accessibility (PTAL 6a) and town centre location supports sustainable modes of travel.</li> <li>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</li> <li>Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage.</li> </ul>	<ul style="list-style-type: none"> <li>Provides essential local facilities in an area of great demand.</li> <li>Improves opportunities for education and training for local residents.</li> <li>Improved layout and design may enhance the Conservation area.</li> <li>Improvements to the layout will eliminate deadzones and reduce the fear of crime associated with existing backland areas/car park.</li> </ul>	<ul style="list-style-type: none"> <li>Loss of commercial uses, including retail parade.</li> <li>New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-EAL8</b>  <b>Orion Park, Northfields Avenue West Ealing, W13</b>	-	++	-	<ul style="list-style-type: none"> <li>• Gain - Provision of a new school</li> <li>• Loss of employment uses</li> </ul>	Flood zone 1 (low risk).	
	<ul style="list-style-type: none"> <li>• Introducing a sensitive use may give rise to potential noise and vibration issues due to proximity of railway.</li> <li>• Reasonable public transport accessibility (PTAL 2/3), although good local connections (Station opposite &amp; bus services nearby) supporting sustainable modes of travel.</li> <li>• 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.</li> <li>• Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage.</li> </ul>	<ul style="list-style-type: none"> <li>• The proposal would provide essential local facilities.</li> <li>• Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>• Development would give rise to the loss of employment use (non-designated).</li> <li>• New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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

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			
<b>S-GNP1</b>  <b>Phoenix Trading Estate, Bilton Road, Perivale UB6</b>	+	++	-	<ul style="list-style-type: none"> <li>• Gain - Provision of a new school</li> <li>• Loss of employment/Industrial uses (non-designated)</li> </ul>	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding (Less Susceptible).	
	<ul style="list-style-type: none"> <li>• Proposal would enable a more efficient use of site.</li> <li>• Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space.</li> <li>• Low public transport accessibility (PTAL 2/3), limits opportunities for sustainable modes of travel, and is likely to encourage car use.</li> </ul>	<ul style="list-style-type: none"> <li>• New school provision provides for essential local facilities.</li> <li>• Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>• Development would involve the loss of employment/industrial use (non-designated).</li> <li>• New school provision key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-GNP2</b>  <b>Site in front of Greenford High School, Ruislip Road, Greenford UB6</b>	-	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>loss of playing fields</li> </ul>	Flood zone 1 (low risk). Small part of the site is susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>Proposal would enable more efficient use of space, although note loss of playing fields</li> <li>Reasonable PTAL levels (3), supporting sustainable modes of travel.</li> <li>Increase in hard surfacing is likely to be detrimental in terms of drainage.</li> </ul>	<ul style="list-style-type: none"> <li>New capacity provides for essential local facilities.</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-GNP3</b>  <b>Ealing Education Centre, Mansell Road, Greenford UB6</b>	+	?	?	<ul style="list-style-type: none"> <li>● Gain - Provision of a new school</li> <li>● Loss of training facilities</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>● Any new school development should facilitate dual use of space for wider community use.</li> </ul>
	<ul style="list-style-type: none"> <li>● Proposal may enable the enhancement of existing building.</li> <li>● Good public transport accessibility (PTAL 4) supports sustainable modes of travel.</li> <li>● 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.</li> </ul>	<ul style="list-style-type: none"> <li>● 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.</li> </ul>	<ul style="list-style-type: none"> <li>● New school provision key to securing an educated workforce in the future, although note potential loss of existing training accommodation.</li> </ul>			

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			
<b>S-HAN1</b>  <b>Eversheds Sports Ground, Hanwell W7</b>	--	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school capacity</li> <li>Loss of MOL and community open space</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>Dual use of open space</li> <li>Given the MOL setting, school buildings should be designed to be sympathetic to the open setting, and their footprint minimised.</li> </ul>
	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Additional capacity provides for essential local facilities in an area of great demand.</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision will be key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-HAN2</b>  <b>Trumpers Way, Hanwell W7</b>	-	+	--	<ul style="list-style-type: none"> <li>• Gain - Provision of a new school</li> <li>• Loss of employment and industrial land (designated)</li> </ul>	Flood zone 1 (low risk)	
	<ul style="list-style-type: none"> <li>• Introducing a sensitive use may give rise to potential noise and vibration issues due to proximity of neighbouring industrial / employment uses.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Additional capacity provides for essential local facilities in an area of great demand.</li> <li>• Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of locally significant industrial site (LSIS), affecting supply of such space.</li> <li>• The proposed use may undermine/prejudice the operation of existing neighbouring industrial uses, and impact on their contribution to the economy.</li> <li>• New school provision key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-HAN3</b>  <b>Wickes</b> <b>83-101</b> <b>Boston</b> <b>Road,</b> <b>Hanwell</b> <b>W7</b>	+	++	-	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>Loss of retail use</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>Consider retention of existing retail function alongside new school.</li> </ul>
	<ul style="list-style-type: none"> <li>Proposal would enable more efficient use of space.</li> <li>Low PTAL (2), although located within town centre, supporting sustainable modes of travel.</li> <li>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.</li> <li>Proposal may offer potential to reduce the amount of hardstanding on site and improve drainage.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision provides essential local facilities in an area of great demand.</li> <li>Supports opportunities for education and training for local residents.</li> <li>Improvements to the layout could potentially eliminate deadzones and improve the integration of the site with nearby residential areas.</li> </ul>	<ul style="list-style-type: none"> <li>Loss of retail use (primary frontage)</li> <li>New school provision key to securing an educated workforce in the future</li> </ul>			

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			
<b>S-HAN4</b>  <b>42 Lower Boston Road, Hanwell W7</b>	-	+	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> </ul>	Flood zone 1 (low risk)	<ul style="list-style-type: none"> <li>Any new school development should facilitate dual use of space for wider community use.</li> <li>Careful consideration needs to be given to impact on trees on site (many of which are covered by TPOs).</li> </ul>
	<ul style="list-style-type: none"> <li>Reasonable public transport accessibility (PTAL 2/3), although in close proximity to town centre supporting sustainable modes of travel.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Provides essential local facilities in an area of great demand, although may result in loss of study centre?/health centre? (community facility).</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>New school provision key to securing an educated workforce in the future.</li> </ul>			

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			
<b>S-SOU1</b>  <b>Southall East – The Arches, The Limes Middlesex Business Centre and Charles House Merrick Road / Bridge Road, Southall UB2</b>	+	++	-	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> <li>Loss of employment uses (non-designated)</li> </ul>	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding.	<ul style="list-style-type: none"> <li>Proposal would need to preserve/be sympathetic to existing buildings of heritage value.</li> </ul>
	<ul style="list-style-type: none"> <li>Site area sufficiently large to accommodate outdoor space on site, reducing dependency on nearby open space.</li> <li>Proposal may enable the enhancement of existing building and more efficient use of site.</li> <li>Currently the site is isolated due to the railway and road infrastructure. PTAL levels vary across the site (1a, 1b, 2 &amp; 3). Wider regeneration opportunities across the whole site may improve the accessibility of the site and promote sustainable modes of transport.</li> <li>Dependent on siting of school within site there may be potential noise and vibration issues due to proximity of railway.</li> </ul>	<ul style="list-style-type: none"> <li>Provides essential local facilities for new population, as part of wider regeneration scheme.</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>New school provision key to securing an educated workforce in the future.</li> </ul>			

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

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			
<b>S-SOU3</b>  <b>Southall West (Southall Gas Works), The Straight, Southall, UB1</b>	+	++	+	<ul style="list-style-type: none"> <li>Gain - Provision of a new school</li> </ul>	Flood zone 1 (low risk). Parts of the site are susceptible to surface water flooding.	
	<ul style="list-style-type: none"> <li>The proposal as part of wider regeneration scheme would support the reuse/remediation of vacant (contaminated) land.</li> <li>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.</li> <li>Currently the site is very isolated due to the railway and road infrastructure. PTAL levels vary across the site (0, 1a, 1b &amp; 2). Wider regeneration opportunities across the whole site may however improve the accessibility of the site and promote sustainable modes of transport.</li> </ul>	<ul style="list-style-type: none"> <li>Provides essential local facilities for new population, as part of wider regeneration scheme.</li> <li>Improves opportunities for education and training for local residents.</li> </ul>	<ul style="list-style-type: none"> <li>As part of mixed use development it could support economic growth and promote local employment opportunities, training and skills attainment.</li> </ul>			



## Appendix 2 – SA Framework

Below is the Sustainability Appraisal Framework applicable to Ealing local plan documents.

Local Plan SA Objective	Criteria	Indicator
<b>1. Actively support inclusive access to essential health, community and local services.</b>	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.	
<b>2. Promote community involvement, voluntary and partnership working.</b>	Will increase community participation in activities and the democratic process?	Percentage of people voting in Elections.

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
<b>3. Preserve and enhance the local historic environment and cultural heritage.</b>	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.	
<b>4. Reduce crime, fear of crime and antisocial behaviour.</b>	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).

Local Plan SA Objective	Criteria	Indicator
		Crime survey: burglary/burglary from dwelling (per 1000 households).
		Theft of/from motor vehicles (per 1000 households).
	Will it reduce the fear/perception of crime?	Perception/fear of crime – no indicator identified.
<b>5. Minimise detrimental noise impacts.</b>	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. Affordable Housing Ratio (house price/earnings affordability)(2006) Total number of housing completions Housing Tenure mix
<b>6. Improve access to well designed, affordable, inclusive and appropriately located housing.</b>	Will it improve the affordability of housing?	
	Will it improve the availability of housing?	

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.
<b>7. Reduce health inequalities and promote healthy living.</b>	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.

Local Plan SA Objective	Criteria	Indicator
<b>8. Protect and enhance public open space</b>	Will it protect open space?	Area of protected open space.
	Will it enhance the quality of open/green space?	Gains or loss in open space (loss of designated open space to development) (AMR – Permissions and Completions data)
		Satisfaction with open space in the borough (Percentage of residents satisfied with the borough's open space)
<b>9. Protect and enhance the natural environment and biodiversity</b>	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

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>
<b>10. Improve Air Quality</b>	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?	
	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
<b>11. Reduce contributions to and vulnerability to climate change</b>	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).

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 <sup>2</sup> emissions by end user.
		CO <sup>2</sup> 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
<b>12. Improve water quality, conserve water resources and minimise the impact of flooding.</b>	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	

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"> <li>a) Control the quantity of surface water runoff from new development (discharge rates restricted to Greenfield including 1 in 100 year on-site attenuation)</li> <li>b) Improve the quality of runoff</li> <li>c) Enhance nature conservation, landscape and amenity value of site.</li> </ul>
	Will it improve water quality in the borough?	Percentage of main rivers and canals recorded as good or fair quality in terms of <ul style="list-style-type: none"> <li>(a) biological quality</li> <li>(b) chemical quality</li> </ul>
<b>13. Enhance existing buildings and facilities, and encourage the reuse/remediation of vacant land and under-utilised buildings.</b>	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

<b>Local Plan SA Objective</b>	<b>Criteria</b>	<b>Indicator</b>
<b>14. Reduce waste generation and increase waste recycling.</b>	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.
<b>15. Reduce vehicular dependency and promote the use of sustainable modes of transport</b>	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).
<b>16. Promote local employment opportunities, training and skills attainment.</b>	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)

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)
<b>17. Support Sustainable Economic growth.</b>	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)		

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
<b>18. Improve opportunities for education and training</b>	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

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

