

Introduction

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

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

Methodology

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

- The production of a Scoping Report (May 2013), which provides the framework for the appraisal of any Plan which the Council is required to undertake.
- Completing the appraisal of the Issues and Options paper, and reporting on findings (through commentary report (October 2013))
- Completing the appraisal of the Publication Plan, and reporting on findings (through the final SA report – i.e. this report).

Scoping

The first stage of the Sustainability Appraisal involved reviewing relevant plans, programmes and strategies, collecting information to develop an understanding of the social, environmental and economic factors in the Borough and beyond. This framework was developed through the Scoping Report.

In the Scoping Report, a Sustainability Appraisal Framework was developed and this framework has been used to appraise the sustainability of the Schools DPD. As part of the framework, nineteen sustainability objectives were identified, covering a range of aspects from environmental, economic and social issues, key to the future of the Borough.

The framework was decided in consultation with key stakeholders as follows. It has also been refined over time to increase the effectiveness and scope of the appraisal process.

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

Consideration of Alternative Options

The initial stage of plan preparation for the Schools DPD involved setting plan objectives and developing broad options relating to the overall plan approach.

Three alternative options were identified as follow:

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

Further options were also developed around the sites themselves and a total of 25 site were identified in the initial long list. The plan objectives and options were appraised against each of the Sustainability Objectives and this showed how the options compared in sustainability terms. This has aided the development and refinement of options.

Following the appraisal of the DPD at the issues and options stage, further refinement has been made to the plan, narrowing the list of sites down to 8. 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 publication plan for the first time also introduces three policies. Both the final list of sites and the policies have been assessed against the Sustainability Objectives. Where appropriate, mitigation measures are also proposed to prevent, reduce or offset significant effects or to maximise beneficial impacts.

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 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 Sustainable Drainage Systems 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, and accessible design.

Future Work / Next Steps

The next stage in the SA process will be to undertake an appraisal of any significant changes that arise following publication of the plan.