

Planning for Schools

Development Plan Document

Sustainability Appraisal Incorporating Strategic Environmental Assessment

Commentary Report - Addendum



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1. Introduction

Report Context

London Borough of Ealing held a six week consultation on the Planning for Schools DPD (Publication Version) from 20th February to 3rd April 2015. Following analysis of the representations received during the consultation period the Council then submitted a revised version of the Plan (incorporating minor and technical changes) to the Planning Inspectorate on 8th July 2015.

In accordance with the parameters set out at Table 3, Stage 3 on Page 55 of the Statement of Community Involvement (SD12), the council will hold a pre-hearing consultation on a select number of the Council's suggested changes to the Plan, both to provide clarity on the submitted plan to be examined and enable progress towards adoption broadly in line with the Council's anticipated timetable. The consultation relates to a number of changes (outlined in ED18), which on reflection are considered more than minor changes, proposed as track changes in document SD2.

As recognised at section 17 of the Sustainability Appraisal document (SD5a), any significant changes which arise post publication, and particularly through the examination process, will need to be appraised. This document therefore provides an accompanying update to the Sustainability Appraisal as a brief addendum focussing solely on Main Modifications, and is available alongside the published Sustainability Appraisal document previously consulted on.

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.

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.

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.

2. Appraisal of Modifications

Assessment Methodology – Main Modifications

The SA procedure appraises each of the Main Modifications against the SA objectives and identifies the effects using the key shown below. The full findings of this SA are set out in the Assessment of the Main Modifications.

Key to the SA matrices

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

The Main Modifications have been assessed against the following 19 Sustainability 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

Assessment of the Main Modifications

The modifications below are expressed in the conventional form of ~~striketrough~~ for deletions and ***Bold Italic*** for additions of text. Where the scoring, comments or summaries have altered as a result of the proposed Main Modifications, the alteration is **highlighted in red** for an alteration to commentary and highlighted by an asterisk (*) for alterations to scoring.

Main Modification 1 (MM1) – Additional text to Schools DPD Policy 1

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.

If sites S-ACT2, S-HAN1, S-EAL4 and S-ACT7 are not developed for educational use, development for other uses would not be in conformity with the London Plan.

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. 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																				
		Sustainability Appraisal Objectives																		
SA Report Addendum		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. The additional clause to Policy 1 protects the open space on sites S-ACT2, S-HAN1, S-EAL4 and S-ACT7 should those sites not be developed for educational use. In essence the purpose of this clause is to ensure that sites which are deemed to be surplus to requirement in relation to meeting school needs, in functional terms remain in an open space use.
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. The additional clause to Policy 1 protects the natural environment and biodiversity on sites S-ACT2, S-HAN1, S-EAL4 and S-ACT7 should those sites not be developed for educational use. In essence the purpose of this clause is to ensure that sites which are deemed to be surplus to requirement in relation to meeting school needs, in functional terms remain in an open space use.
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. The additional clause to Policy 1 reduces the flexibility to allow non-educational uses on sites S-ACT2, S-HAN1, S-EAL4 and S-ACT7 and therefore performs negatively against this objective. However it must be taken in to consideration that the probability of the sites listed within the Planning for Schools DPD shortlist not being developed for educational use is relatively low, especially due to the small number of site allocations.
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.

Main Modification 2 (MM2) – Introductory text to Appendix 1 (para 7.1 in document SD3)

The red line boundary identifies sites to be allocated through this DPD for extended or new education use. On sites where a dashed red line boundary is identified within each red line boundary, this represents an area within the site in which it is considered a new or extended building could appropriately be located. The precise footprint of a new or extended building can only be established through the subsequent planning process, once detailed development proposals have been submitted, fully assessed and approved. The floorspace for education use on all sites will be established with reference to up-to-date guidance (currently BB103 June 2014); on MOL/playing fields it should reflect the minimum site area necessary to provide the required educational facilities and cause the least harm to the openness of the wider site. On these sites, the finally approved footprint and access will determine the precise area of land to be de-designated from MOL.

This introductory text at the beginning of Appendix 1 provides further clarification with regards to the dashed red line boundary identified within each red line boundary on sites S-ACT2, S-HAN1, S-EAL4 and S-ACT7.

Schools DPD																				
		Sustainability Appraisal Objectives																		
SA Report Addendum		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19
Schools DPD Publication Version – Main Modification 2.		NI	NI	NI	NI	NI	NI	NI	+	+	NI									
SA Objective	Score	Commentary																		
1	NI	This main modification would not result in any significant impact on SA Objective 1: Actively support inclusive access to essential health, community and local services.																		
2	NI	This main modification would not result in any significant impact on SA Objective 2: Promote community involvement, voluntary and partnership working																		
3	NI	This main modification would not result in any significant impact on SA Objective 3: Preserve and enhance the local historic environment and cultural heritage																		
4	NI	This main modification would not result in any significant impact on SA Objective 4: Reduce crime, fear of crime and antisocial behaviour.																		
5	NI	This main modification would not result in any significant impact on SA Objective 5: Minimise detrimental noise impacts.																		
6	NI	This main modification would not result in any significant impact on SA Objective 6: Improve access to well designed, affordable, inclusive and appropriately located housing																		
7	NI	This main modification would not result in any significant impact on SA Objective 7: Reduce health inequalities and promote healthy living																		
8	+	This main modification scores positively against SA Objective 8: Protect and enhance open space as it seeks to minimise the area of land to be de-designated from MOL and cause the least harm to the openness of the wider site																		
9	+	This main modification scores positively against SA Objective 9: Protect and enhance the natural environment and biodiversity as it seeks to minimise the area of land to be de-designated from MOL and cause the least harm to the openness of the wider site																		

10	NI	This main modification would not result in any significant impact on SA Objective 10: Minimise detrimental noise impacts.
11	NI	This main modification would not result in any significant impact on SA Objective 11: Minimise detrimental noise impacts.
12	NI	This main modification would not result in any significant impact on SA Objective 12: Minimise detrimental noise impacts.
13	NI	This main modification would not result in any significant impact on SA Objective 13: Enhance existing buildings and facilities, and encourage the reuse / remediation of vacant land and under-utilised buildings.
14	NI	This main modification would not result in any significant impact on SA Objective 14: Reduce waste generation and increase waste recycling.
15	NI	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	NI	This main modification would not result in any significant impact on SA Objective 16: Promote local employment opportunities, training and skills attainment.
17	NI	This main modification would not result in any significant impact on SA Objective 17: Support sustainable economic growth
18	NI	This main modification would not result in any significant impact on SA Objective 18: Improve opportunities for education and training.
19	NI	This main modification would not result in any significant impact on achieve SA Objective 19: Promote cultural and community identity.

Main Modification 3 (MM3) – change in approximate school siting boundary on S-EAL4 (See document SD3)

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			
S-EAL4 Former Barclays sports ground, Park View Road, Ealing W5	--	++	+	<ul style="list-style-type: none"> Gain - Provision of a new school Loss – MOL, although could result in potential improvements in public access to open space and community facilities. 	Flood zone 1 (low risk)	<ul style="list-style-type: none"> Given the MOL setting, school buildings should be designed to be sympathetic to the open character of the site. Community access to open facilities should be secured. <p style="background-color: #ffe6e6;">The boundary change of the approximate school siting on the site leads to a higher PTAL of 4 compared to previous level of 1B. In addition the change in approximate school siting will increase the opportunity for further improvements to accessibility, promote sustainable travel by users of a school and / or associated facilities available for community use on the site, particularly in respect of public transport, pedestrian and cycle access.</p>
	<ul style="list-style-type: none"> 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. Public Transport Accessibility Level 4, (compared to Level 1B at previous approximate school siting see document SD1). 	<ul style="list-style-type: none"> New school provision provides for essential local facilities in an area of high demand. Improves opportunities for education and training for local residents. Opportunity to enhance community access to space. 	<ul style="list-style-type: none"> New school provision will be key to securing an educated workforce in the future. 			

3. Next Steps

How to comment on the Sustainability Appraisal Report

This SA Report Addendum will be available for a six week public, pre-hearing consultation alongside the Main Modifications to the Planning for Schools DPD (Publication Version). The consultation will run between 10th August and 21st September 2015.

Please note that representations can only be made on the proposed main modifications and **NOT** on the original publication version (Feb 2013). Representations already received on the Plan have been retained, so there is no need to repeat previous representations. Representations can be made over a six-week period, from **Monday 10 August to Monday 21 September 2015, 5pm.**

Inspection of documents

Copies of the Planning for Schools DPD Main Modifications are available:

- [In the examination library - ED18](#)
- at all main libraries in the borough
- at the Customer Service Centre, Perceval House, 14-16 Uxbridge Road W5 2HL

Representations can be submitted:

- By email: planpol@ealing.gov.uk
- By post: Planning Policy, Ealing Council, 4th Floor Perceval House. 14-16 Uxbridge Road. Ealing, London W5 2HL

Please note that copies of the representation will be published on the website. Personal addresses and signatures will be redacted.

For further information, please contact the Programme Officer, Caroline Caldwell.

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