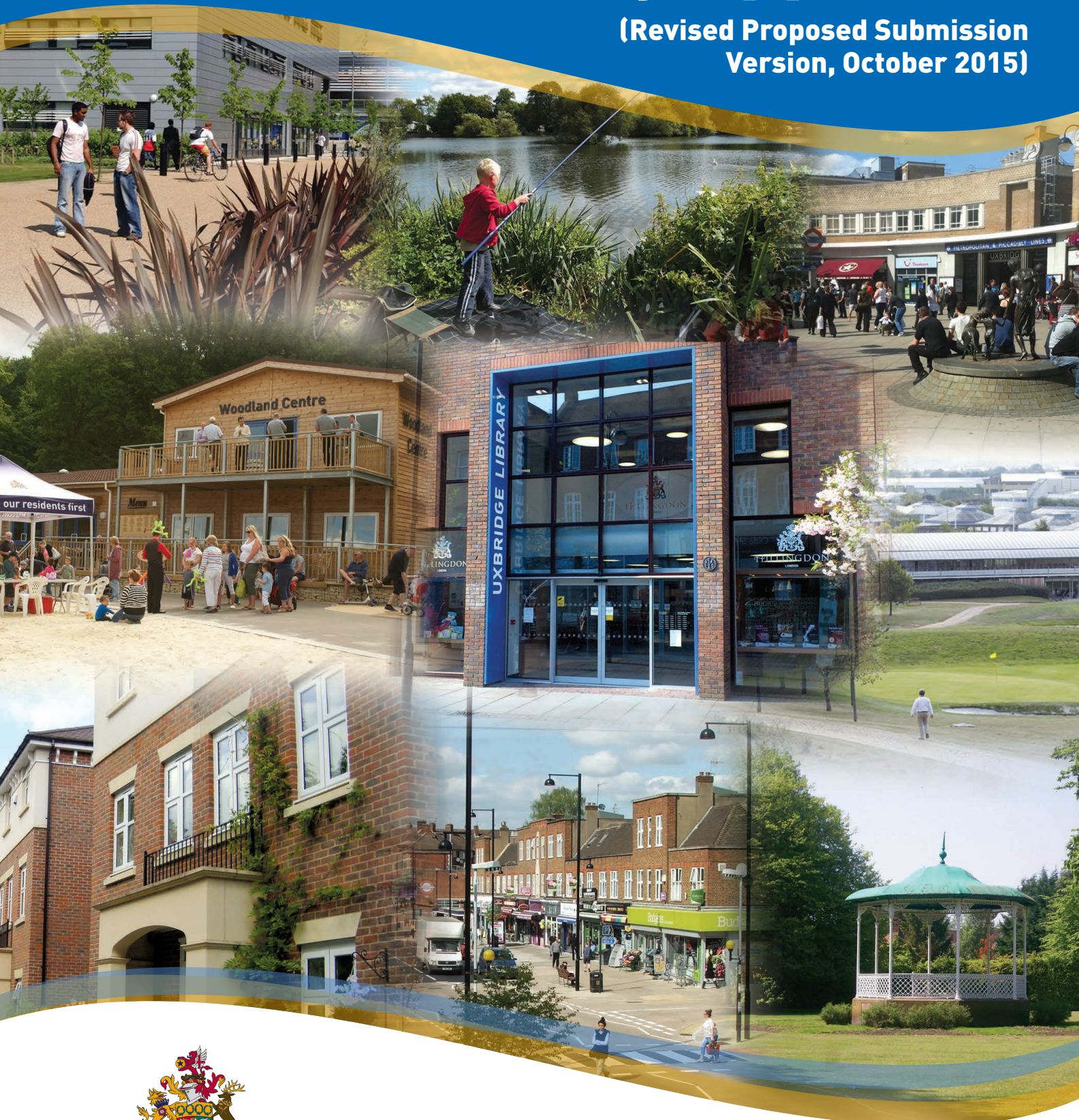


Local Plan: Part 2 Addendum to Sustainability Appraisal

(Revised Proposed Submission
Version, October 2015)



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Preface

This is an Addendum to the Sustainability Appraisal of the London Borough of Hillingdon's Local Plan Part 2. The Local Plan Part 2 is made up of the Development Management Policies document, the Site Allocations and Designations and an Atlas of Changes to the existing Policies Map.

The Local Plan Part 2 alongside the Sustainability Appraisal was subject to a Pre-submission consultation (Regulation 19 consultation) between September 2014 and November 2014. Following the consultation, the Local Plan Part 2 has been revised to take account of representations received and the adoption of the London Plan, The Spatial Development Strategy for London Consolidated with Alterations since 2011 (March 2015). In addition, a number of new site allocations, land designations and policies have been included into the document.

Therefore, this Addendum to the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version 2014 has been prepared to consider any additional sustainability effects resulting from the changes made to the proposed policies, any new policies that have been included as well as cumulative impacts. As such, it does not constitute a standalone document and needs to be read in conjunction with the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014. In addition, this Addendum updates, where necessary, the existing baseline and relevant plans policies and programmes.

How to get involved

You are invited to comment on this Addendum to the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014. It assesses the sustainability effects of the proposed changes to the Local Plan Part 2 Proposed Submission Version September 2014.

The Local Part 2 Revised Proposed Submission Version October 2015 thus constitutes a revision to the Proposed Submission Version September 2014. The publication period for the Revised Proposed Submission Version October 2015 of the Local Plan Part 2 begins on 26th October 2015 and ends on 8th December 2015.

The Local Plan Part 2 is made up of the Development Management Policies, Site Allocations and Designations and an Atlas of Changes to the Policies Map. All of these documents as well as the Sustainability Appraisal and this Addendum are available to view on the Council's website www.hillingdon.gov.uk/lpp2 and at public libraries throughout the Borough and at Planning Information Services, Level 3, Civic Centre, Uxbridge (Monday to Friday 9.00am - 5.00pm).

Representations should be submitted to the Council on a representation form, which is available to download from the Council website, www.hillingdon.gov.uk/planning. Copies of the form can also be obtained from Planning Information Services at the Civic Centre and all borough libraries. Alternatively, you can request a copy of the form by contacting the Planning Policy Team on 01895 250230 or by email at: localplan@hillington.gov.uk.

The representation forms can be submitted in the following ways:

- By email at: localplan@hillington.gov.uk
- By post to: Planning Policy Team, 3N/02, Residents Services, Civic Centre, High Street, Uxbridge, UB8 1UW.
- By fax to: 01895 250 223 marking your response for the attention of the Planning Policy Team.

Please note that copies of representations will be made publically available. They cannot therefore be treated as confidential. All responses must be submitted by 5.00 pm on Tuesday 8th December 2015.

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1. Non Technical Summary

1.1. Outline

- 1.1.1. This Addendum appraises the changes proposed to the Local Plan Part 2 Proposed Submission Version September 2014 and supplements its Sustainability Appraisal. It considers the sustainability effects of the additional sites and development management policies that have been included as well as any amendments made that are considered to have the potential to alter the sustainability effect of the policy. On the basis of the appraisal, a series of recommendations and advisory comments are made to help ensure that the Plan is sustainable.
- 1.1.2. The Local Plan is the local development strategy for Hillingdon. The Local Plan Part 2 provides further detail to the overall quantum of growth and general locations for development set out in the Part 1 through identifying specific sites for development (site allocations) and setting out policies for the consideration of planning applications (development management policies).
- 1.1.3. The Local Plan Part sits at the bottom in the hierarchy of documents that constitute the strategic planning framework for Hillingdon. Higher tier documents include the London Plan 2015 and the National Planning Policy Framework.
- 1.1.4. The current state of the environment, the likely evolution thereof without implementation of the plan, existing environmental problems relevant to the plan or programme and the environmental characteristics of Hillingdon
- 1.1.5. The Plan area for the Local Plan Part 2 is the London Borough of Hillingdon. The Borough as a whole is therefore likely to be affected by the Plan and the environmental characteristics set out below are relevant to the Borough as a whole. The Local Plan is being developed on the back of a detailed assessment of the needs of the borough. It was supported by a significant evidence base that helped shape

the policies and vision. In summary the key environmental¹ issues for the arising from the evidence base include the following

Poor air quality

- 1.1.6. The annual mean objective for nitrogen dioxide, set at 40ug/m³ has not been met in large areas of the Borough, especially the in the south around Heathrow (for NO₂) and along the major roads. Much of Hillingdon is included in the Air Quality Management Area. Recent forecasts from the EU show that compliance with the minimum limit for nitrogen dioxide will not happen over the plan period with or without the Plan.

Maintenance of the quality of designated sites for nature conservation, Green Belt, MOL and Green Chains

- 1.1.7. In general the quality of designated sites for nature conservation has been identified as good. However, the sites have been designated some time ago and the biodiversity value of designated sites may be subject to change over time. Without the Plan changes to existing designations would be maintained and continued to be applied in the consideration of planning applications on the basis of outdated evidence.

Water resources

- 1.1.8. The borough has a number of rivers, watercourses and aquifers that have been identified as increasing flood risk. Flood risk and flood events are likely to increase with the effects of climate change.
- 1.1.9. The 2010 Flood and Water Management Act identified the Council as a Lead Local Flood Authority. It now has responsibility for managing surface water flooding.
- 1.1.10. However, ensuring there is a partnership approach to managing surface water is difficult with many disparate groups having some role to play.

¹ Given that the non-technical summary is a requirement of the SEA Directive, only the environmental issues are summarised here.

1.1.11. Without the Plan the ground rules to managing surface water flooding and annual monitoring has to measure the implementation of these would not be established.

1.1.12. Whilst flood risk and flood events are an increasing threat, ironically so are water shortages and droughts. The borough is identified as being in a severely water stressed area. This means consumption outweighs natural recharging of water resources. Without the Plan the optional requirement for water efficiency resulting from the recent Housing Standards review could not be triggered and planning conditions requiring water efficiency in excess of 125 per person per day could not be applied.

Threats posed by Climate Change

1.1.13. Climate change is a factor that in general is beyond the control of Hillingdon and outside of the controls of the Core Strategy. However, the effects of climate change are an influence on planning. Rising temperatures, building subsidence, flooding and increased precipitation will affect buildings, people and the environment of the borough.

1.1.14. Without the Plan Hillingdon would not be able to contribute to reducing its impacts on climate change by seeking reductions in emissions as a result of fewer vehicle movements and from buildings by increasing energy efficiency.

Energy Efficiency of Existing Development

1.1.15. New development will be subjected to improved building regulations which have energy efficiency embedded within. However, the vast majority of the buildings to be used over the plan period already exist and have done for some time. This older stock is likely to have poor energy efficiency credentials and contributes significantly to the total carbon emissions from built development.

1.1.16. Generally, forward plans consider only the quality of new development with limited scope for improving existing stock. In terms of energy though, even if all new development were zero carbon and highly energy efficiency, the borough would still be unable to reduce its current carbon footprint associated with energy.

- 1.1.17. Without the Plan, poor energy efficiency levels within existing buildings would be likely to remain unchanged.

Access to Open Space

- 1.1.18. The southern part of the borough has been identified as having a poor open space offering. Access to recreational space is at a premium and it is envisaged that this will come under increasing pressure as a growing population is to be accommodated. The Plan will help to increase the open space offering whilst preserving the viability of new development.

Noise

- 1.1.19. Noise on many of the boroughs roads exceeds 80dB. Large areas of housing experience noise levels over 70dB. Aircraft noise associated with Heathrow airport has been identified as a significant historic problem. However, further studies now reveal that noise disturbance goes beyond simply impacting on amenity and the quality of life. Research has now revealed that noise disturbance can pose a significant threat to health. The Plan will ensure that the management and mitigation of noise is properly considered in the development and use of land.

1.2. Environmental Protection Objectives

- 1.2.1. The first stage in the Sustainability Appraisal process involved identifying other relevant policies, plans and programmes, and environmental protection objectives. They have been taken into account in developing and revising the Sustainability Appraisal objectives used throughout the appraisal process. These are set out in Section 5 of the Sustainability Appraisal Proposed Submission Version September 2014 and updated in Section 5 of this Addendum with an explanation of the changes to the Regional Spatial Strategy that have come into effect in March 2015. The application of the appraisal has therefore ensured that there is consistency between this Plan and the broader objectives of a range of planning documents.
- 1.2.2. Alternatives, a description of how the assessment was undertaken, the likely significant effects and measures envisaged to prevent, reduce offset any significant adverse effects

- 1.2.3. Given that many of the additional sites designated were included into the Plan on the basis of evidence or policy direction from the Part 1 or London Plan, they did not represent genuine alternatives for the purpose of sustainability appraisal. Alternatives were considered primarily in the earlier stages of the plan-making process (stage B) and the assessment was undertaken in accordance with the methodology set out in Section 4 of this Addendum.
- 1.2.4. The development management policies have been optimised in accordance with the recommendation resulting from the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014 as part of the changes appraised in this Addendum. The appraisal of the proposed changes to the Plan did not identify any significantly adverse effects on biodiversity, population, human health, & fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape. Therefore, the appraisal of the proposed changes in this Addendum did not raise the need for further mitigation measures.

1.3. Monitoring

- 1.3.1. The SEA Directive requires the sustainability appraisal to include the methods for monitoring sustainability objectives. The annual monitoring review for the Local Plan will be the primary method for monitoring performance.

2. Introduction

2.1. Purpose of this Document

- 2.1.1. This document has been prepared in accordance with Section 19 of the Planning and Compulsory Purchase Act (as amended) and constitutes an Addendum to the London Borough of Hillingdon's Sustainability Appraisal the Local Plan Part 2 Proposed Submission Version September 2014. Therefore, it must be read in conjunction with the Sustainability Appraisal the Local Plan Part 2 Proposed Submission Version September 2014. It is not a stand-alone document.
- 2.1.2. Using a range of indicators this Addendum considers the impacts of the proposed changes to the Local Plan Part 2 Proposed Submission Version September 2014 on a range of social, economic and environmental sustainability objectives.
- 2.1.3. The sustainability appraisal process plays an important part in ensuring that the Plan is fully consistent with and helps to implement the principles of sustainable development. In conjunction with its parent report, the Local Plan Part 2 Sustainability Appraisal Proposed Submission Version (September 2014), this Addendum effectively seeks to ensure that the changes made help can deliver sustainable development. The results of the appraisal process will inform the Local Plan Part 2 and contribute to the reasoned justification of policies.

2.2. The Local Plan Part 2

- 2.2.1. The Local Plan Part 2 is being prepared within the framework of the Local Plan Part 1, which was adopted in 2012 and sets out the Council's Vision for 2026, strategic objectives and overarching policies. The Local Plan Part 2 comprises a series of documents, including the Development Management Policies document, the Site Allocations and Designations document and the Atlas of Changes to the existing Policies Map. It was subject to a Regulation 18 consultation in December 2012 and a Regulation 19 consultation between September and November 2014.
- 2.2.2. Following public consultation the Local Plan Part 2 has been revised to take account of the representations received and the adoption of the London Plan, The Spatial

Development Strategy for London Consolidated with Alterations since 2011 (hereafter referred to as the London Plan). This has involved amendments to emerging policies, the inclusion of new policies as well the allocation of additional development sites. Due to the nature of the amendments made to the emerging Plan, the Council considers it necessary to carry out further public consultation (Regulation 19) prior to submitting the Local Plan Part 2 to the Secretary of State for examination. However, the additional Regulation 19 consultation will be focussed, inviting comments on the proposed changes only.

3. Process and Methodology

3.1. Sustainability Appraisal Process

3.1.1. To ensure continuity and consistency with previous reports in this sustainability appraisal process, the methodology to be applied in appraising the changes made to the Local Plan Part 2 documents will be the same methodology that was used in the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014. The process was outlined in the main SA report (2014). For ease of reference the table below indicates where this report fits within the wide appraisal process.

	Stage	Date
Local Plan Part 1	Sustainability Appraisal Scoping Report	November 2004
Local Plan Part 1	Sustainability Appraisal of Preferred Options	October 2005
Local Plan Part 1	Sustainability Appraisal of Revised Core Strategy Preferred Options	January 2007
<i>Sustainability Appraisal Review and Update of Baseline</i>		
Local Plan Part 1	Sustainability of the Core Strategy Consultation Draft	June 2010
Local Plan Part 1	Sustainability Appraisal Update	January 2011
<i>Sustainability Appraisal Review and Update of Baseline</i>		
Local Plan Part 1	Sustainability Appraisal Submission Document	July 2011
<i>Sustainability Appraisal Review and Update of Baseline</i>		
Local Plan Part 2	Regulation 18 Consultation	December 2012
Local Plan Part 2	Regulation 19 Consultation	June 2014
<i>Sustainability Appraisal Review and Update of Baseline</i>		
Local Plan Part 2	Regulation 19 Consultation	October 2015 (this report)

3.2. Reviewing the Sustainability Framework

- 3.2.1. The need to keep consistency with the Local Plan Part 1 has meant that the sustainability appraisal has become a 'living document'. Its scope and composition has been kept under review largely through formal consultations. The Council has therefore resisted developing an entirely new framework, which has allowed for a more consistent and considered appraisal of the whole plan process.
- 3.2.2. The original framework was developed following lengthy consultation which set the broad framework agenda. The concept of sustainability has not altered fundamentally and the framework has remained largely as first envisaged. However, during the review process objectives relating to climate change have been added. The primary difference though is how the SA framework has been applied to each stage of the development of the plan. Whilst the framework has remained relatively unchanged, its application is informed by relevant plans and programmes which have been kept under review. This means the sustainability appraisal reflects the current principles and objectives for sustainable development.

3.3. Feedback on Sustainability Appraisal through Consultation

- 3.3.1. The decision to keep the appraisal framework under review has effectively been endorsed through the consultations on Local Plan Part 1 which have not raised fundamental concerns with either the process or application of the SA. These consultations effectively asked the questions regarding the scope and content of the SA as well as its application. No objections were received and the Inspector found the Sustainability Appraisal and process to be sound for the Local Plan Part 1 in 2012.
- 3.3.2. As a consequence, the Council has undertaken a further review of the SA framework that was found sound by the Planning Inspector and that did not raise any objections. A further consultation on the developing Local Plan Part 2 also raised no objections and the appraisal framework is still considered sound.

4. Sustainability Appraisal Framework

4.1. Methodology

- 4.1.1. The Sustainability Appraisal Framework involves a range of social, economic and environmental sustainability objectives and indicators that are used in the appraisal process to assess the likely contribution of the policies that are subject to sustainability appraisal towards the achievement of the objectives.
- 4.1.2. The appraisal methodology involves developing a scoring system that can help determine the performance of the Core Strategy. The standard approach is to use a matrix that includes rankings to determine the compatibility with the sustainability objectives; these range from highly positive through to highly negative.
- 4.1.3. The assessment of the Local Plan Part 1 objectives and strategic policies was based on the professional opinion of the officers at the London Borough of Hillingdon. The officer's assessment considered the baseline data, the key sustainability issues, and the evidence base of both the Local Plan and Sustainability Appraisal. This is primarily an objective based approach using opinion; however, an effects led approach (i.e. assessments based on likely measurable outcomes) has been used where appropriate.
- 4.1.4. The same approach has been adopted for Part 2 of the Local Plan. To ensure consistency the same framework is being used as well as the same scoring system. However, there is no need to review the objectives of Part 2 as these are a natural progression of Part 1. Only the policies and site allocations will be considered as part of this appraisal.

4.2. Sustainability Framework

- 4.2.1. The following framework was considered sound in the Local Plan Part 1 examination in public and is appropriate to use to ensure both parts of the Local plan subjected to the same objectives. The full framework can be found in Part 1 to which this report is appended.

Sustainability Objectives		Reference in Appraisal
1	To improve air quality to a standard that is acceptable for human and ecological health	Air Quality
2	To ensure sustainable management and conservation of wildlife and habitats representative of the borough and reverse those in decline	Biodiversity
3	To protect and preserve landscape character, historic buildings, archaeological sites and cultural features of importance to the community	Landscape & Heritage
4	To avoid the adverse effects of activities and development on the natural functions of soil and water systems	Soil & Water
5	To reduce contributions towards, and vulnerability to, the effects of climate change	Climate Change
6	To minimise the hazard risk from flooding in Hillingdon	Flood Risk
7	To ensure efficient use of non renewable resources and minimise the production of waste	Resources and Waste
8	To encourage efficient use of available land that will not foreclose on future options	Efficient Land Use
9	To create a variety of high quality residential environments that provides everybody with the opportunity to live in a decent home	High Quality Housing
10	To provide environments that promote healthy and safe living and reduce anti social behaviour	Health, Noise, Safety, Crime
11	To improve the ready access to essential services and facilities for all residents	Accessibility
12	To promote methods to reduce dependence on private transport and manage the effects of traffic on the environment	Traffic reduction
13	To provide residents of all ages with the option to access education and skills based enhancement	Skills & Education
14	To encourage built environments of high quality urban design that assists in enhancing areas amenity value and promote community sense of place	Design & Amenity

15	To promote growth in the economy whilst improving its environmental and social performance	Economic Growth
16	To enhance the image of the borough as a location for new business	Business Image
17	To encourage business to provide a range of jobs and services that will support and enhance existing residential and employment areas	Provision of Jobs

4.3. Appraisal Methodology

4.3.1. The purpose of the Sustainability Appraisal including the SEA Directive is to determine the likely significant effects of the Core Strategy. The determination of an effect is set out as:

Nature and Scale of Impact
x
Sensitivity of Receptor
=
Significance of Effect

Nature and Scale of Impact

4.3.2. Environmental assessment uses the following criteria to define the extent and magnitude of an impact:

- Effect duration (whether short, medium or long term)
- Effect nature (whether direct or indirect, reversible or irreversible)
- Whether the impact occurs in isolation, is cumulative or interactive
- Performance against environmental quality standards or other relevant pollution control thresholds
- Compatibility with environmental policies

Sensitivity of Receptor

- 4.3.3. For the purposes of this report, the receptor is the Sustainability Appraisal objective. Not all the objectives carry the same level of weight; some objectives are more important or cover a more pressing issue for the Borough.

Significance of Effect

- 4.3.4. The significance of the effect is ranked using the following criteria:

Symbol	Like Effect on the SA Objective
++	A likely highly positive effect
+	A likely positive effect
0	No significant effect or clear link
-	A likely negative effect
--	A likely highly negative effect
?	Uncertain or insufficient information to determine effect
/	Potential positive or negative effect depending on implementation

4.4. Making Recommendations

- 4.4.1. The outcome of the appraisal process is a series of recommendations that will identify areas for 'sustainability' improvement. These recommendations take the form of measures to prevent, reduce and offset the environmental and sustainability impacts associated with implementation. These constitute mitigation measures as required under the SEA Directive.
- 4.4.2. This report will be distributed for consultation alongside the Local Plan Part 2. This provides an opportunity to comment on the recommendations and for interested parties to suggest others. A final sustainability statement will be produced that will

set out where the Plan has been improved to consider the recommendations of this appraisal.

4.5. Difficulties Encountered

- 4.5.1. The Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014 was a series of recommendations that have identified areas for 'sustainability' improvement. These take the form of measures to prevent, reduce and offset the environmental and sustainability impacts associated with implementation. These also constitute mitigation measures as required under the SEA Directive.
- 4.5.2. Further to this, advisory comments are made where there was scope for improving a policy against the sustainability objectives, but a direct conflict with other plans and programmes did not exist.
- 4.5.3. Where appropriate, the recommendations and advisory comments resulting from the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014 have been taken into account in the proposed changes to the document. Those that have not been taken into account have been carried forward in this Addendum.

4.6. Monitoring

- 4.6.1. The SEA Directive requires the sustainability appraisal to include the methods for monitoring sustainability objectives. The annual monitoring review for the Local Plan will be the primary method for monitoring performance as well as the framework set out in Appendix 3 of the Main SA Report (2014).

4.7. Links with SEA

- 4.7.1. This appraisal incorporates the requirements of SEA. The table showing the links with the entire SA (this report and the main report) has been updated in Appendix 1.

5. Other Plans and Programmes

5.1. Background

- 5.1.1. A key part to sustainability appraisal as set out in the regulations and in the SEA Directive is to ensure that the appraised plan reflects the aims and objectives of other plans and programmes.
- 5.1.2. There are a range of plans, programmes and policies that are relevant to the Local Plan. The identification of these originally formed part of Stage A (scoping stage) in the Local Plan sustainability appraisal process, which was carried out November 2004. Since then, the list of relevant plans policies and programmes have been updated as part of every review. The list of the most relevant plans and programmes that have influenced the appraisal is included in the Appendix of the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014.
- 5.1.3. The Sustainability Appraisal must also take account of the planning framework within which the Local Plan Part 2 sits. The development of the Local Plan Part 2 is guided by higher tier documents and its objectives are therefore largely constrained. It provides the detailed policies of how to implement the planning framework, accordingly this appraisal will focus on this relationship with the preceding plans and how it performs in meeting the strategic objectives.

5.2. Plans and Programmes Update

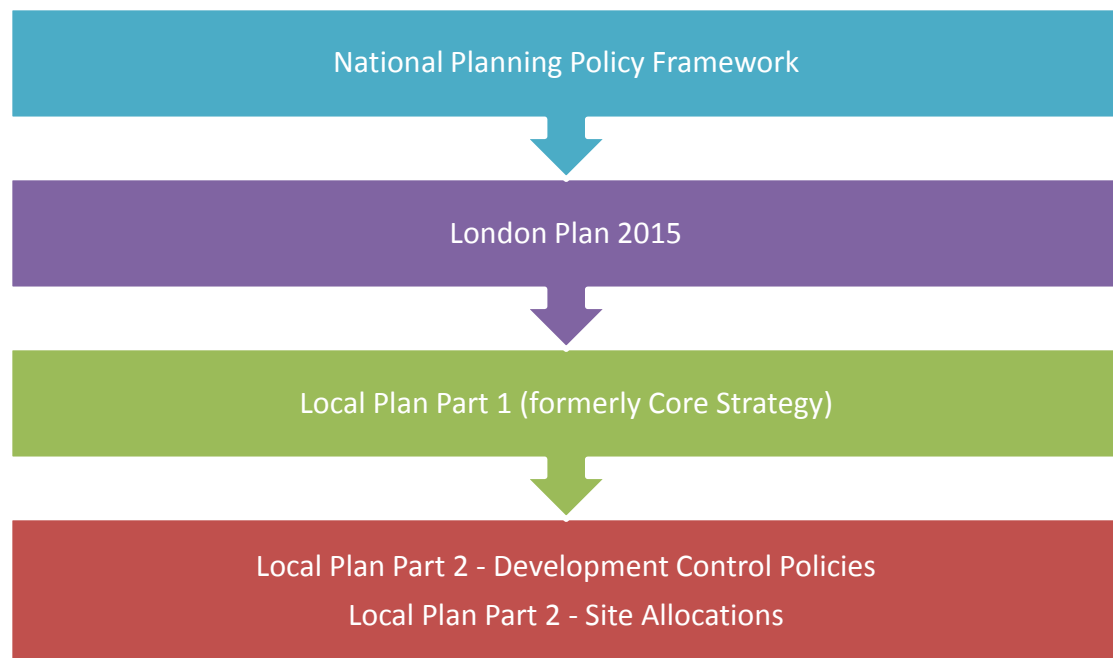
- 5.2.1. A review of the most relevant plans and programmes has been undertaken following the previous sustainability appraisal consultation (as part of the Local Plan Part 1 submission version consultation). A full list of the most relevant plans and programmes that have influenced the appraisal is included within Part 1, additions to the list are included within Section 6 of this report.

5.3. Relationship with other Relevant Plans

- 5.3.1. The Local Plan Part 2 is effectively the culmination of a series of policy documents that set a framework for development. The development of Part 2 is guided by the

preceding documents and its objectives are therefore largely constrained. It provides the detailed policies of how to implement the planning framework, accordingly this appraisal will focus on this relationship with the preceding plans and how it performs in meeting the strategic objectives.

5.3.2.



5.3.3. Since the publication of the Local Plan Part 2 Sustainability Appraisal Proposed Submission Version September 2014 there has been a significant change in guidance at the regional level. In March 2015 the London Plan, The Spatial Development Strategy for London Consolidated with Alterations Since 2011 has come into effect. This has increased the annual monitoring target for housing delivery in Hillingdon from 425 to 559 units per annum, which in turn increases the overall housing target set out in the Local Plan Part 1 from 6,375 dwellings, to 8,385 dwellings. Although, the Local Plan Part 2 is prepared within the framework of the Local Plan Part 1, the increased housing delivery target has been taken account of in the revision of the Site Allocations and Designations document. A number of additional housing sites

are proposed to be allocated in order to demonstrate that the Council has sufficient available land supply to meet the increased target over the plan period.

- 5.3.4. Whilst this increased level of growth constitutes a significant amendment to the Local Plan, it has not been subject to sustainability appraisal because it has already been appraised within the context of the Sustainability Appraisal of the London Plan.

6. Baseline

6.1. Establishing the Baseline

6.1.1. The term 'baseline information' refers to the existing environmental, economic and social characteristics of the area likely to be affected by the Local Plan and their likely evolution without implementation of new policies. It effectively provides the basis against which to assess the likely effects of alternative proposals in the plan

6.1.2. Similarly to the plans, policies and programmes the baseline sets the context for the appraisal and forms part of Stage A in the sustainability appraisal process, which has been carried out in November 2004. The Local Plan Part 1 was developed on the back of a detailed assessment of the needs of the borough. It was supported by a significant evidence base that helped shape the policies and vision. Since then the baseline has been updated at every stage in the sustainability appraisal process. The following is therefore an update of the baseline based on problems identified in Part 1 and its related Sustainability Appraisals.

6.1.3. Since the publication of the Sustainability Appraisal the Local Plan Part 2 Proposed Submission Version September 2014, which contains the last update to the baseline, the following documents have been prepared and added to the Local Plan evidence base, and thus the baseline of for the Plan.

- Hillingdon Green Belt Assessment Update 2013
- Gypsies and Travellers and Show People Accommodation Needs Assessment September 2014
- Whole Plan Viability Study October 2014
- Employment Land Update 2014
- Archaeological Desk-based Assessment February 2014
- 5 Year Supply of Deliverable Housing Sites 2014/2015 - 2019/2020
- Hillingdon SINC Review October 2015

7. The Appraisal of Site Allocations

7.1. Review Process

- 7.1.1. The Local Plan Part 2 Proposed Submission Version September 2014 has been revised to take account of comments received during the pre-submission consultation between September and November 2014, the adoption of the London Plan in March 2015, the latest planning history of sites as well as officer recommendations.
- 7.1.2. This section sets out the appraisal of the changes made to the site allocations that are proposed as part of the Site Allocations and Designations document, considering their impacts on the sustainability effects of the proposed site allocations.

7.2. New Homes

- 7.2.1. The changes made to the site allocations for residential and mixed use development in the New Homes chapter can be broadly categorised as follows.

Minor editorial changes

- 7.2.2. In some instances revisions have involved minor editorial changes to policies, the correction of typos or amendment of the supporting text or Site Information Table. These revisions have not led to any changes to the policy content and direction and have not altered the sustainability effects of the Plan. Therefore, appraisal results from the Local Plan Part 2 Sustainability Appraisal September 2014 are considered to remain valid and are not repeated as part of this Addendum.

Revision to the content of policies and nature of site allocations

- 7.2.3. In other cases, emerging policies have undergone revision to the content and wording of policies. In these cases, there is potential for a change in the likely significant effects the allocation may have. As such, the appraisal in this Addendum re-considers the appraisal results from the Local Plan Part 2 Sustainability Appraisal September 2014 in light of the changes made.

Omission and addition of site allocation policies

- 7.2.4. Thirdly, new site allocation policies have been included into the Local Plan Part 2 documents. A total of 6 allocation sites that were proposed as part of the Local Plan Submission Version September 2014 have been omitted.
- 7.2.5. Table 1 Sites omitted since the Local Plan Part 2 Proposed Submission Version September 2014

Sites omitted	Reason for omission
Initial House, Field End Road	Development completed or likely to be completed before Plan adoption
Packet Boat House	Development completed or likely to be completed before Plan adoption
Western Core	Site not considered deliverable due to multiple land ownership/land assembly issues
Land to rear of 119 - 137 Charville Lane	No indication for existing permission on renewed; Green Belt location
Martin Close and Valley Road	No intention for intensification of residential use of these sites
Uxbridge Health Centre	NHS intention for the continued use of site as a health facility

- 7.2.8. A total of 15 housing or mixed use allocations have been additionally included. All newly included sites have not been subject to sustainability appraisal previously and are appraised as part of this Addendum.
- 7.2.9. The table overleaf shows the sites included in the Plan since the Local Plan Part 2 Proposed Submission Version September 2014.

7.2.10.

7.2.11. Table 2 Sites included since the Local Plan Part 2 Proposed Submission Version
September 2014

Additional sites included	Reason for inclusion
SA 4 Fairview Business Centre	Included in response to representations received
SA 6 Golden Cross	Site likely to be delivered during the plan period
SA 7 Union House	Site likely to be delivered during the plan period
SA 9 Audit House and Bellway House	Site likely to be delivered during the plan period
SA 12 Former allotments and Melrose Close Car Park	Site likely to be delivered during the plan period
SA 16 Northwood Station	Public consultation by developer
SA 21 Eagle House, The Runway	Site likely to be delivered during the plan period
SA 24 Benlow Works	Potential regeneration opportunity
SA 30 Grand Union Park	Site likely to be delivered during the plan period
SA 31 Fassnidge Memorial Hall	Site likely to be delivered during the plan period
SA 33 Kitchener House	Site likely to be delivered during the plan period
SA 34 Blues Bar	Site likely to be delivered during the plan period

SA 37 Old Coal Depot	Included in response to representations received
SA 40 26 - 36 Horton Road	Site likely to be delivered during the plan period
SA 41 21 High Street, Yiewsley	Site likely to be delivered during the plan period

Common changes

- 7.2.14. Some amendments have been made consistently across all site information tables. These included specification of:
- A site's location in a new designation that is proposed as part of the Local Plan Part 2 within the site information table;
 - The relevant Flood Zone and other flood risk information
- 7.2.15. In addition, the policy criterion requesting development on allocations sites to be consistent with other policies of the Plan has been omitted from all site allocation policies. Instead this requirement has been integrated into the supporting text at paragraph 3.20 in the 'New Homes' chapter.
- 7.2.16. Where proposals on strategic sites were being considered through the development management process and have since been approved, the planning history has been updated and the policy amended to make reference to the existing permission
- 7.2.17. These changes have been made to provide a greater level detail, to ensure consistency across all proposed policies or to avoid repetition. They constitute minor editorial changes and do not result in material changes to the policy.
- 7.2.18. Table 3 overleaf sets out the appraisal of the allocation policies that have been reconsidered in the light of the changes made and those that have not been subject to sustainability appraisal before. It does not contain a repetition of appraisal results of the site allocations where previous appraisal results remain valid and are carried over. These are set out in the Sustainability Appraisal of the Local Plan Part 2

Proposed Submission Version September 2014 and are not repeated as part of this Addendum.

Table 3 Appraisal of Site Allocations

		Sustainability Appraisal Objectives																
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
Housing & Mixed Use Allocations		-	0	/	0	0	++	0	0	++	0	+	/	0	/	+	0	-
SA 1 - Enterprise House, Hayes		<p>The amendments to the policy include an update to planning history and increase in proposed number of units to reflect the existing permission. Changes made have not altered the likely sustainability effects of the allocation. This allocation would make an efficient use of an underused building and a brownfield site. Conversion and reuse of the existing building would constrain design although would maintain the existing relationship with the neighbouring listed building; a complete rebuild would result in a more modern efficiency structure but could conflict with the listed buildings and the conservation area it is within. Housing on the site would likely generate more traffic impacting on air quality objectives. On balance the development makes effective use of brownfield land increasing housing opportunities and maintaining the character of the area.</p>																
SA 4 - Fairview Business Centre, Botwell		-	0	/	0	/	++	0	0	++	/	+	/	0	/	+	0	-
SA 4 - Fairview Business Centre, Botwell		<p>This is a new site allocation. It is a designated employment site, which currently forms part of the Hayes Industrial Area. The loss of industry from this site reduces the opportunity for job provision, although construction would provide a temporary employment. There is some potential of adverse impact on the setting of the nearby Botwell Thorn EMI Conservation Area. Although residential-led mixed use development on this site is likely to generate an increased number of trips to and from</p>																

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	the site, its locations provides for high public transport accessibility which is likely to reduce adverse impacts on air quality. The allocation makes an efficient use of a brownfield site and a substantial contribution to the provision of housing and regeneration of Hayes Town Centre. On balance the site scores positively against the SA objectives.																
	-	+	+	+	+	++	0	0	++	+	+	/	+	++	-	0	-
SA 5 - Land to south of railway (including Nestles), Hayes	<p>This site has been sub-divided into 3 land parcels that reflect land ownership. Additional policy requirement have been included to ensure that a minimum of 20% of site A and 50% of Sites B and C will accommodate employment generating uses, higher densities are located along the canal, 10 % of site A provides open space as well as a public park. In addition, requirements have been inserted for a heritage assessment, enhancements to the canal corridor and the provision of a pedestrian link to Hayes Town Centre. This allocation results in the reuse of a site that has been a predominant source of employment in recent years. The site includes listed buildings and is in a conservation area. The combined loss of the employment opportunity from this site and the neighbouring Blythe Road development is a concern. The policy requires the inclusion of a mixed use scheme but on balance the employment offer for the site is likely to be lower. However, the proposal would result in positive benefits for ecology and flood risk and will be an efficient use of brownfield land. The policy inclusion for community facilities on the site also scores positively. Environmentally and socially this development scores high, although the integration of the heritage assets will be dependent on implementation of the relevant policies. The increase in traffic in Hayes is a concern given the baseline air quality position. On balance the site scores positively against the SA objectives.</p>																

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SA 6 - Golden Cross, Public House	-	0	0	0	+	++	0	0	++	0	+	/	0	++	0	0	0
<p>This is a new site allocation and the site already benefits from planning permission for redevelopment to residential. Due to the site's size, sustainability impacts are likely to be limited. Whilst the allocation will involve the loss of a community facility, it will contribute to providing much needed housing. The allocation maximises the efficiency of land use on a brownfield site and will increase accessibility to essential local services in Hayes Town Centre. However, the increase in traffic in Hayes is a concern given the baseline air quality position. On balance this is a positive allocation.</p>																	
SA 7 - Union House, Clayton Road	-	0	0	0	+	++	0	0	++	0	++	/	0	+	0	0	-
<p>This is a new site allocation. The site is currently occupied by an office building and has been given Prior Approval for the change of use to residential. Due to the site's size, sustainability impacts are likely to be limited. The loss of office floor space and the resulting impact on job provision is the primary concern in relation to this site. The redevelopment would have limited environmental impacts, mitigates impacts on flood risk and would benefit from good transport links and access to shops and services. However, the increase in traffic in Hayes is a concern given the baseline air quality position. On balance this is a positive allocation.</p>																	
SA 9 Audit House and Bellway House	0	0	/	0	0		0	0	++	0	++	/	0	+	0	0	-
<p>This is a new site allocation. The site is currently occupied by 2 office buildings and has been given Prior Approval for the change of use to residential. The loss of office floor space and the resulting impact on job provision in this town centre location is the primary concern in relation to this site. The redevelopment would have limited environmental impacts and would benefit from good transport links and access to shops and services. On balance this is a positive allocation.</p>																	

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SA 10 269- 285 Field End Road	0	+	0	0	+	+	0	0	+	+	+	0	0	+	0	0	0
	The amendments to the allocation include a correction of the previously stated site area and requirements to discuss drainage infrastructure with Thames Water. Changes made have not altered the likely sustainability effects of the allocation. This is a relatively small site and therefore will not score significantly positive or negatively. It is however a good use of an existing site, well connected and with limited environmental impacts. The insertion of the requirement to discuss site-specific proposals may help to ensure that future development takes account of drainage network capacity issues.																
SA 12 - Former Bellmore Allotments and Melrose Close Car Park	-	/	-	0	0	+	0	0	++	+	-	/	0	+	0	0	-
	This is a new site allocation. Whilst the development of this site for supported and general housing involves the loss of allotment space, it makes a contribution to meeting needs for different types of housing in the borough, including affordable and older persons' needs. Although a transfer of reptile species from the site to a receptor site has already taken place, there remains potential for adverse impacts on the nature conservation value of the adjoining Countryside Conservation Area, Green Belt and Local Nature Reserve. Low levels of public transport accessibility is likely to generate additional car traffic, which is a concern given the baseline air quality position. There are no likely significant effects on the economic sustainability objectives.																

Sustainability Appraisal Objectives

	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
SA 13 - Royal Quay, Summerhouse Lane, Harefield	0	/	/	0	/	++	0	0	++	+	+	-	0	+	0	0	-
	<p>The site area has been extended to take account of a further planning permission and a Prior Approval increasing the proposed number of units to 62 units. The increase in site area that is lost to housing further reduces opportunity for job provision in this location and isolates the remaining employment uses in a part of the borough where accessibility levels are already low. There is a conservation area designation on the site and nature conservation interest in the surrounding area. The allocation will result in the efficient reuse of this brownfield site. Whilst the increase in residential capacity will benefit housing provision, it further increases previous concerns over links to sustainable transportation and design. However, on balance this site continues to score positively as it provides much needed housing but there are environmental uncertainties.</p>																
SA 14 - Master Brewer and Hillingdon Circus	-	++	++	+	++	++	0	0	++	+	++	-	0	++	0	0	0
	<p>The allocation has been amended to provide for the event that predominantly residential development comes forward, requiring a range of housing types and tenures, high quality design as well as clearly defined links to the nearby shopping area. Whilst the amendments to the policy strengthen its likely positive impact on design, accessibility and housing, they also increase concern about traffic generation and air quality impacts. However, the allocation continues to result in development that promotes the positive use of the Green Belt to the west and brings back into use disused brown field land. Overall this is a positive allocation.</p>																

Sustainability Appraisal Objectives

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SA 15 - Royal Sorting Office, Ruislip Manor	0	+	+	0	0	++	0	0	+	/	+	0	0	+	0	0	-
	This policy has been amended to omit the requirement for exclusion from the Town Centre Designation. The exclusion of the policy criterion does not alter the likely sustainability effect of the allocation. A relatively small site that scores positively against the environmental objectives and provides additional housing opportunities. However, it will result in the loss of a site that has some employment generating benefits.																
SA 16 - Northwood Station, Green Lane	-	0	/	0	/	++	/	0	++	/	++	-	0	/	+	+	+
	This is a new site allocation for comprehensive mixed use development and the redevelopment of Northwood Underground Station, which is likely to produce significant sustainability impacts. The allocation is likely to deliver substantial new housing, provide new public space and improve the vitality of Northwood as a Local Centre through improved new and improved retail offer, and therefore scores positively against social and economic objectives. In addition, the development is likely to further increase accessibility through funding the provision of step-free access at Northwood Underground Station, which will benefit protected equality groups, such as older persons, disabled persons and mothers. However, there are concerns over potential impacts of the development on the integrity and significance of existing heritage assets, including adjacent conservation areas. High quality design will play a crucial role in ensuring the quality of residential development, integrating this major scheme into the specific local context and mitigating potential impacts on the local character and distinctiveness of the area. Despite relatively good public transport accessibility, the redevelopment of the site is likely to increase traffic and reduce air quality. In addition, there may be impacts on drainage infrastructure resulting from the scale of the proposed development as well as noise impacts resulting from the railway on the residential properties dwellings. The allocation therefore scores negatively against some of the environmental objectives.																

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SA 17 - 42 -46 Ducks Hill Road	0	+	+	0	+	++	0	0	++	0	0	-	0	+	0	0	-
	<p>This is a new site allocation. This site has received planning permission for 10 x 5-bed dwellings and will help to meet the need for larger family accommodation in the Borough. In addition, the allocation scores positively against the environmental objectives considering and mitigating impacts on habitats, trees and drainage network capacity. There is a nature conservation site and Area of Special Local Character in proximity. The site's location in an area with limited transport links is of some concern as occupants are likely to travel by car. The allocation has no identifiable impact on the achievement of economic sustainability objective and is on balance positive.</p>																
SA 18 - West End Road, South Ruislip	0	+	+	0	+	++	0	0	+	+	+	0	0	/	0	0	-
	<p>The allocation has been amended to reflect the sites location in Critical Drainage Area and insert a requirement for proposals to be discussed with Thames Water. Amendments to the policy and supporting table do not alter the likely sustainability effect of the allocation. A relatively small site that scores positively against the environmental objectives particularly as it would result in the loss of a builder's yard with associated environmental impacts. The allocation also provides additional housing opportunities. There is uncertainty about the relationship with amenity, health and noise objectives given the site is in close proximity to RAF Northolt, which has been granted consent to increase the amount of flights. The development will result in the loss of a site that has some employment generating benefits. On balance the site scores positively but careful consideration over the relationship with RAF Northolt needs to be given through implementation.</p>																

Sustainability Appraisal Objectives

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SA 19 - Braintree Road, South Ruislip	-	+	+	+	+	++	0	0	++	+	++	-	0	+	+	0	-
	<p>The allocation has been amended to reflect the latest planning history, including 132 units in accordance with the existing permission. Amendments to the policy and supporting text do not alter the likely sustainability effects of the allocation. The allocation involves the loss of industry and reduces opportunity for future job provision. However, the approved mixed use development involves a balanced mixed use scheme that increases accessibility for recreational uses, provides for some employment, results in additional housing and brings back into use brownfield land that has been vacant for some time. The likely increase in car traffic is a concern, as is the air quality impact given the baseline situation. Environmentally, the allocation should result in a net gain although there could be a lower provision of employment opportunities. Amendments to the policy and supporting text do not alter the likely sustainability effects of the allocation.</p>																
SA 20 Bourne Court	0	+	0	0	+	++	0	0	+	-	++	+	0	+	0	0	0
	<p>This allocation was previously names Odyssey Business Park and has been renamed. The policy has also been updated to reflect the latest planning history, including planning permission for 49 units, and the site's location in a Critical Drainage Area. Amendments to the policy and supporting text do not alter the likely sustainability effects of the allocation. The allocation involves the loss of the existing care home and day centre, but would result in a residential scheme that helps to meet housing need, including the need for affordable housing; whilst making efficient use of a brown field site. It would also produce benefits against many of the environmental objectives, although noise resulting from the railway is likely to be of concern. The location next to South Ruislip tube station should allow for a reduction in car parking requirements and minimise the need to travel. On balance this is a positive allocation.</p>																

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SA 21 Eagle House, The Runway	0	+	0	0	0	++	0	0		-	++	+	0	+	0	0	-
<p>This is a new site allocation. The site has been given Prior Approval for the provision of 24 housing units. The loss of employment floor space and subsequent impact on future job provision is of concern, as are potential noise impacts from the railway and nearby employment sites. However, the location next to South Ruislip tube station should allow for a reduction in car parking requirements and minimise the need to travel. Overall this allocation scores positively particularly against environmental objectives. Due to the small nature of the site none of the sustainability effects are likely to be significant.</p>																	
SA 22 - Chailey Industrial Estate, Pump Lane, Hayes	-	+	+	+	0	++	0	0	++	+	++	/	0	+	0	0	-
<p>The allocation has been amended to include residential-led development with small scale commercial uses at ground floor level. In response to land owner intentions for future use of the site, the site area has been amended to exclude the Matalan part of the site. In addition, the division between Site A and B has been omitted, as has the requirement for 40% employment generating development. The reduction of the site area is minor and unlikely to make a significant difference to the sustainability effects of the proposed site allocation. However, the exiting use is industrial and the exclusion of the policy criterion requiring 40 % employment generating uses further increases previous concern over the loss of opportunity for future job provision. On the other hand, the allocation would result in a residential scheme that results in additional housing to meet local need and supporting commercial uses. The increase in traffic is a concern as is the air quality impact. Environmentally, the allocation should result in a net gain and the allocation is on balance positive.</p>																	

Sustainability Appraisal Objectives

	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
SA 24 - Silverdale Road/Western View, Hayes	-	+	/	+	+	++	0	0	++	+	++	-	0	+	+	+	+
	<p>The site area has been divided into 2 site elements. The policy has been amended to require a net gain of 60 units on Site A with a focus on retail provision on the junction of Station Approach/Western View and the provision of 141 units on Site B. The loss of industry from Site B reduces the opportunity for a future increased provision of jobs, although some employment generating capacity in this location is retained through new retail provision. The policy encourages high quality design and active canal frontages across the whole site, which will help to link the site with Hayes Town Centre, and thereby improve accessibility, permeability and the canal side. The redevelopment of the whole site would result in a far more efficient use of land than currently is the case and increase housing opportunities in the area. There are concerns around air quality and potential impacts on heritage assets on and adjacent to the site, which may result in negative performance against some of the environmental objectives. On balance this is a positive allocation.</p>																
SA 25 - Benlow Works	-	0	/	+	+	++	0	0	/	+	+	-	0	+	0	0	-
	<p>This is a new site allocation. The primary area of concern with the allocation of the Grade 2 listed structure is the potential impact of conversion on this heritage asset and its setting. Furthermore, the release of this site from its existing employment designation is likely to reduce opportunity for future job provision. However, the conversion of this neglected structure will bring back into use a largely vacant building and is likely to secure much needed repair works, whilst raising design standards and making efficient use of a brownfield site. Although the policy allows for residential development to come forward on this site, and thereby has the potential to contribute to housing delivery, this is likely to be of low density. High accessibility levels may only to some extent offset the increase in traffic likely to result from the development, which is of concern given the air quality baseline position. On balance this is a positive allocation.</p>																

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SA 26 - Long Lane, Hillingdon	0	0	0	0	0	++	0	0	++	+	++	0	0	+	0	0	0
<p>The policy has been amended to include a criterion requiring the retention of existing health care facilities and the maintenance of the existing green buffer. Neither amendment significantly alters the sustainability effects of the proposed allocation. This is a small scale proposal that should result in a net gain in environmental benefits.</p>																	
SA 26 High Street / Bakers Row	-	0	/	0	/	++	0	0	++	+	+	+	0	++	+	+	+
<p>The policy has undergone substantial changes. It has been amended to provide a new focus on residential-led mixed use, retaining and providing new retail uses at ground floor, allow for a mix of town centre uses on upper floors alongside residential development, require enhancement of the Cocks yard link and provide scope to incorporate the redevelopment of the land to the south of the site. In addition, the proposed number of units has been removed and to ensure residential capacity is determined through design and a requirement for proposals to have regard to surrounding townscape and heritage assets. Although this is a small scale proposal that is likely to have negligible environmental benefits, due to the site's prominent location there are concerns around potential impacts on nearby heritage assets and high standards of design will be crucial in achieving a positive relationship with the surrounding townscape. However, the proposed allocation will deliver much needed housing, generate additional jobs through the intensification of retail and introduction of other town centre uses, whilst contributing to centre vitality. Due to site's high PTAL, there will be limited need for travel by car by future residents and site occupants and the development will deliver an improved linkage between the town centre and the bus station. The development will also result in a more efficient use of land and is, on balance, a positive allocation.</p>																	

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SA 30 Grand Union Office Park	-	0	-	0	+	++	0	0	++	+	-	-	0	0	0	0	-
<p>This is a new site allocation and an existing employment site, which has been given Prior Approval for change of use from office to residential would secure additional housing to meet needs in the borough, albeit the need for smaller units only. The site is located in an area with low accessibility levels and the proposed allocation is likely to result in a substantial increase in car-based travel adversely affecting air quality. Whilst the loss of employment on this site reduces opportunity for future job provision, the development would make efficient use of a brown field site and provides increased residential amenity in a canal side location. Whilst there is some concern about potential impacts on the conservation area and its setting, on balance this is a positive allocation.</p>																	
SA 33 Fassnidge Memorial Hall	0	0	/	+	+	++	0	0	++	+	++	-	0	/	0	0	0
<p>This is a new site allocation in Uxbridge Town Centre, which provides residential development and a replacement community facility. It contributes to the provision of housing and makes substantially better use of this brownfield site than the current development. Whilst the site provides high levels of accessibility to public transport, local shops and services, some increase in traffic is likely to occur as result of the development. In addition, there is potential of adverse impact on the adjacent conservation area and its setting. The proposed allocation has no likely significant effects on the economic sustainability objectives and scores positively against most of the social and environmental objectives.</p>																	

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SA 33 Kitchener House	-	0	0	0	0	++	0	0	++	+	+	+	0	+	0	0	-
	This is a new site allocation that due its small site area is unlikely to have any significant sustainability effects. The primary concern is the loss of the employment. However, the approved development will bring back into use a vacant building, deliver much needed housing in addition to retail development, increasing efficiency of land use and vitality of Yiewsley Town Centre.																
SA 34 Blues Bar, Station Road	-	0	0	0	0	++	0	0	++	+	+	+		+	0	0	0
	This is a new site allocation that due its small site area is unlikely to have any significant sustainability effects. The approved development will deliver much needed housing in addition to retail units, increasing efficiency of land use and vitality of Yiewsley Town Centre.																
SA 36 - Hayes Bridge, Uxbridge Road, Hayes	-	++	+	+	0	++	0	0	++	+	++	-	0	+	0	0	-
	The site allocation has been amended to direct higher density residential development to the canal side and B8 uses to the southern part of the site fronting Uxbridge Road. In addition, the provision of residential moorings and reference to the Blue Ribbon network has been included into the requirement for canal side improvements. Amendments to the policy do not significantly alter the sustainability effects of the policy. The loss of industry from this designated employment site reduces the opportunity for a future increased provision for jobs. The redevelopment of the site would however result in a far more efficient use of land that increases the housing opportunities in the area. It will also result in benefits against many of the environmental objectives. The location next to the canal is a positive and the policy reflects this.																

Sustainability Appraisal Objectives

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SA 37 Old Coal Depot	-	++	/	+	+	++	0	0	++	+	++	-	/	/	/	/	-
	<p>This is a new site allocation, which is due to the size of the site, development is likely to have a number of significant sustainability effects. The loss of industry from this site reduces the opportunity for a future increased provision for jobs, although the retention of some employment generating uses mitigates this to some extent. Despite a low PTAL, the site is located adjacent to Yiewsley Town Centre and provides good access to essential shops and services, as well as public transport when the Crossrail station opens. However, there are significant concerns around the feasibility of improving the currently narrow access road to the site, which may increase traffic and congestion. Therefore, the allocation is unlikely to result in net benefits for air quality. However, development on site will provide improvements to the nature conservation sites within and adjoin the coal yard, therefore scoring positive against biodiversity objectives. In addition, the provision of community infrastructure and residential development on site scores favourably against the social objectives. Overall, this is a positive allocation that, depending on the details of the proposed scheme, and its implementation has the potential for significant social, environmental and economic benefits.</p>																
SA 38 - Padcroft Works, Tavistock Road, Yiewsley	-	++	++	+	+	++	0	0	++	+	++	-	0	+	0	0	-
	<p>This site allocation has been amended to reflect the latest planning history, including the permission for 308 residential units on this site. Amendments made do not significantly alter the sustainability effects of the policy. The loss of industry from this site reduces the opportunity for a future increased provision for jobs. The redevelopment of the site would increase the housing opportunities in the area. It will also result in benefits against many of the environmental objectives. There are uncertainties regarding transport impacts and air quality. On balance the development represents an efficient use of land that will result in a net environmental gain over the existing development.</p>																

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SA 41 - Trout Road, Yiewsley	-	++	++	+	+	++	0	0	++	+	++	-	0	+	0	+	0
<p>This site allocation has been amended to reflect the latest planning history and incorporate Caxton House as Site B, which has recently received permission for 44 residential units. Amendments made do not significantly alter the sustainability effects of the policy. The loss of industry from this designated site reduces the opportunity for a future increased provision for jobs albeit the existing uses have been in a historic state of decline. The redevelopment of the site would however result in a mixed use scheme that provides for housing and employment. It will also result in benefits against many of the environmental objectives. There are uncertainties regarding transport impacts and air quality. On balance the development represents an efficient use of land that will result in a net environmental gain over the existing development. The extension of the site area does not make a significant difference to the sustainability effects of the allocation.</p>																	
SA 40 26 - 36 Horton Road	-	+	+	+	+	++	0	0	+	+	++	-	0	+	0	0	+
<p>This is a new site allocation with an existing permission for 50 residential units. The primary concern is the loss of industry, however the allocation provides for additional housing units to meet local need, increased amenity and good access to essential shops and services, whilst raising design standards in the town centre. The allocation also makes efficient use of a brownfield site and scores well against the environmental objectives with the exception of traffic and air quality objectives.</p>																	

Sustainability Appraisal Objectives

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-	+	+	+	+	++	0	0	+	+	++	-	0	+	0	0	+

SA 41 - 21 High Street

This is a new site allocation with an existing permission for 50 residential units. Due the small site area, this mixed use allocation is not likely to have any significant sustainability effects. Providing residential and a range of retail uses, the allocation supports retail growth and much needed housing delivery in an accessible canal side location, scoring positively against socio-economic objectives. Above all, the allocation makes efficient use of a brownfield site, which is currently vacant, and raises design standards in the town centre.

7.3. Community Infrastructure

7.3.1. The previous 'School sites' chapter of the Site Allocations and Designations Proposed Submission Version September 2014 has been revised to incorporate the following changes:

- The latest position on secondary school and healthcare provision has been included in response to consultation responses.
- Two school sites, Lake Farm, Hayes and St Andrews Park, Uxbridge, have been omitted on the basis that construction on these sites was completed in 2014.
- The planning history for the remaining school site allocation Laurel Lane has been updated and the site area revised in line with the planning permission.

7.3.2. In addition, other types of community infrastructure have been addressed although no sites are allocated. Accordingly, the chapter has been renamed 'Community Infrastructure'.

7.3.3. The deletion of the developed sites is not appraised as part of this Addendum because these sites did not represent alternative options for the purpose of the sustainability appraisal. The other changes involve updates and the provision of greater detail and do not alter the sustainability effects of the Plan.

8. The Appraisal of Land Designations

8.1. Process

8.1.1. This section considers the appraisal of the changes made to the land designations proposed within the Local Plan Part 2 Revised Proposed Submission Version October 2015.

8.2. Rebalancing Employment Land

8.2.1. The changes made to the employment land designations can be broadly categorised as follows.

Minor editorial changes

8.2.2. In most instances revisions have involved minor textual changes to provide greater clarity. These revisions have not led to any changes to the land designations and therefore have not altered the sustainability effects of the Plan. The appraisal results from the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014 are considered to remain valid and are not repeated as part of this Addendum.

Revision to the extent of land area

8.2.3. The Strategic Industrial (SIL) Location 'Pump Lane, Hayes' has been reduced in land area by 3.05 ha, omitting Benlow Works in the south west as well as the Pump Lane railhead site in the south east of the existing employment designation. These areas have been excluded from the proposed SIL designation on the following basis:

8.2.4. Benlow Works is proposed for release from its existing employment designation. Accordingly, the site is proposed to be allocated for mixed - use development in the New Homes chapter of the revised Site Allocations and Designations document.

8.2.5. Pump Lane, Hayes is proposed as a Railhead Safeguarding Area. The intention is to safeguard this railhead site from inappropriate development for future minerals transportation in line with London Plan and NPPF requirements.

- 8.2.6. The proposed Royal Quay Locally Significant Employment Location (LSEL) has been amended to exclude the area to the west of Summerhouse Lane, which has been given planning permission and prior approval for residential development. As a result only the northern most part of the existing Summerhouse Lane employment designation on Canal Way is to be retained in addition to Salamander Quay to the south of Summerhouse Lane, which is proposed as new LSEL.
- 8.2.7. A range of Hotel and Office Growth locations have been designated and a new, corresponding strategic employment policy has been included into the Site Allocations document. These include:
- Uxbridge Town Centre (hotel and office growth)
 - Heathrow perimeter (outside of Bath Road LSEL) (hotel and office growth)
 - Stockley Park LSEL (office growth)
 - Heathrow perimeter Bath Road LSEL (office growth)
 - Hayes Town Centre (hotel growth)
- 8.2.8. However, the Hotel and Office Growth Locations have been designated in response to the direction provided in Policy E2 Location of Employment Growth and the Local Plan Part 1, which identifies the locations for hotel and office growth on the basis of available evidence. As such, the growth locations designated in the Local Plan Part 2 September 2015 have been appraised as part of the Sustainability Appraisal of the London Borough of Hillingdon's Core Strategy. Therefore, they are not appraised as part of this Addendum.
- 8.2.9. Given the potential of the revisions to alter the sustainability affect of the designation, the appraisal in the Table below of this Addendum re-considers the appraisal results from the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014 in light of the changes made. The appraisal results of those land designations that have undergone only minor editorial changes, and therefore continue to remain valid, are not repeated here.

Table 4 Appraisal of Land Designations

		Sustainability Objectives																	
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs	
Rebalancing Employment Land		-	0	0	0	0	++	0	0	0	0	0	/	0	+	++	++	++	
Pump Lane, Hayes		<p>Whilst the 'Pump Lane SIL has been reduced in land area by 3.05 ha, omitting Benlow Works in the south west as well as the Pump Lane railhead site in the south east of the existing employment designation, this does not significantly alter the sustainability effects of the designation. The primary concern resulting from the changes in terms of loss of employment are already considered within the appraisal of new site allocation SA 25. The Plan effectively safeguards the remainder of the Pump Lane SIL for employment uses over the course of the plan period. The intention of the plan is to facilitate a regeneration of this area to improve the current building stock and diversify the range of businesses. This will be an improvement to the existing site. However, any intensification will result in additional air quality impacts. Access to the site could be improved particularly in terms of sustainable transport links. Any future development of this site must result in measures that encourage sustainable transportation and reduce the air quality impacts. The reduction of the site area is not considered to make a significant change to the sustainability effects of the proposed SIL designation.</p>																	

Sustainability Objectives

Rebalancing Employment Land	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
Salamander Quay, Summerhouse Lane Harefield	0	0	0	0	0	++	0	0	0	0	0	/	0	0	++	++	++
<p>The changes made to the proposed LSEL significantly reduces the site area of the existing designation and thereby the extent of likely impacts. However, the primary concern resulting from the changes in terms of loss of employment are already considered within the appraisal of new site allocation SA 25 There are a number of sensitive receptors in the area including the Grand Union Canal and the Colne Valley. Any proposals that come forward as a result of this allocation need to be compatible with these sensitive receptors. The locations of the sites are relatively rural and consideration needs to be given to sustainable transportation.</p>																	

8.3. Green Belt, Metropolitan Open Land, Green Chains and Nature Conservation

8.3.1. The changes made to the Green Belt, Metropolitan Open Land, Green Chains and Nature Conservation chapter focus primarily on the proposed extensions and new Sites of Importance for Nature Conservation (SINCs). Since the publication of the Local Plan Part 2 in September 2014, the Council commissioned further evidence base work and the changes to the proposed SINCs are based on the latest evidence based. The proposed designation of these sites is not appraised in this Addendum because they do not present genuine alternatives for the purpose of the sustainability appraisal.

8.4. Key Transport Interchanges

8.4.1. No changes have been made to this chapter

8.5. Minerals Safeguarding

8.5.1. The Bulls Bridge Aggregates Recycling and Processing Location was included the Local Plan Part 2 Proposed Submission Version October 2015. The site has already received planning permission and has not been appraised in this document because the requirement to safeguard them is set through the London Plan and National Planning Policy Framework.

8.5.2. In addition, a total of 3 railhead safeguarding sites have been included into the Minerals Safeguarding section of the revised Site Allocations and Designations document Proposed Submission Version September 2015. These are proposed to be safeguarded from inappropriate development for future aggregates distribution.

8.5.3. Railhead Safeguarding Areas have not been appraised in this document because the requirement to safeguard them is set through the London Plan and National Planning Policy Framework. As with the Aggregates Recycling Processing Location, the identification of these sites is influenced solely by the location of railheads and therefore there are no alternatives. The bulk transport and distribution of aggregates will be subjected to the policies set out in the Development Management Policies.

9. The Appraisal of Development Management Policies

9.1. Process

9.1.1. This section sets out the appraisal of the changes made to the development management policies that are proposed as part of the Local Plan Part 2, considering their impacts on the sustainability effects of the proposed site allocations.

9.1.2. The changes made to the development management policies can be broadly categorised as follows.

Minor Editorial Changes

9.1.3. In some instances revisions have involved minor editorial changes to policies to provide greater or lesser detail and more, the correction of typos or amendment of the supporting text. These revisions have not led to any substantial changes to the content of policies and have not altered the sustainability effects of the Plan. Therefore, appraisal results from the Local Plan Part 2 Sustainability Appraisal September 2014 are considered to remain valid and are carried over. These are not repeated here.

Revision to Content of Policies

9.1.4. A number of emerging policies have undergone substantial revision, involving material changes to the policy direction and as such there is potential for a change in the likely significant effects of the policies. Therefore, the appraisal in this Addendum will re-consider the appraisal results from the Local Plan Part 2 Sustainability Appraisal September 2014 in light of the changes made.

Deletions, Additions and Rationalisation of Policies

9.1.5. Thirdly, a total of 3 new development management policies have been added. All newly included policies have not been subject to sustainability appraisal previously and are appraised as part of this Addendum. These are identified in Table 5 overleaf.

Table 5 New Development Management Policies Included

Additional policies included	Reason for inclusion
Policy DMHB 14: Trees and Landscaping	Included as result of representations received
Policy DMEI 13: Importation of Waste Material	Included in response to recent development management concerns where waste management falls between the enforcement and control regimes of the local waste authority and the Environment Agency.
Policy MIN 4: Re-use and Recycling of Aggregates	Included in response to London Plan requirement

9.1.8. Quite a number of policies have been rationalised, consolidated and merged with other policies. These are identified in Appendix 2.

Common Changes

9.1.9. The policy criterion requesting development management policies to be consistent with other policies in the Plan has been omitted from all development management policies.

9.1.10. Appendix 2 sets out a complete list of the development management policies contained in the revised Local Plan Part 2 Proposed Submission Version October 2015. It identifies the nature of the changes that have been made since the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014 and clearly indicates:

- Where previous appraisal results continue to remain valid and are carried over,
- Where previous appraisal results have been reconsidered in the light of changes made; and

- Where new development management policies have been newly included that have not been subject to appraisal before and full appraisal is required.

9.1.11. The Table overleaf sets out the appraisal of the allocation policies that have been reconsidered in the light of the changes made and those that have not been subject to sustainability appraisal before. It does not contain a repetition of appraisal results of the site allocations where previous appraisal results remain valid and are carried over. These are set out in the Sustainability Appraisal of the Local Plan Part 2 Proposed Submission Version September 2014 and are not repeated as part of this Addendum.

Table 6 Appraisal of Development Management Policies

Development Management Policies	Sustainability Appraisal Objectives																
	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DME 1 Employment Uses in Designated Sites	+	/	+	/	/	++	0	0	0	+	+	+	+	/	++	++	++
	<p>The policy provides more detail on the strategic approach to employment land set out in Part 1 and its application through the development management process. The policy has been amended to provide greater clarity in criteria A and D. In addition, former criterion D iv, which set out land designation as an exception test to the principle of criterion D, has been deleted. Criterion E has amended to exclude the list of examples of compromised integrity and operations on employment. These amendments do not significantly alter the sustainability effects of the policy. The location of the sites in existing industrial and well connected areas promotes growth in suitable locations. The policy provides clarity about the location of employment uses and importantly includes requirements (part e of policy) for proposals in close proximity, although at lesser detail, which will help locate suitable neighbouring development and avoid the risk of incompatible developments. However, an additional criterion has been included that allows for small scale ancillary development on designated employment sites. This amendment will help to provide more sustainable workplaces and strengthens the policy's contribution against the social sustainability objectives.</p>																

		Sustainability Appraisal Objectives																
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
Development Management Policies		-	0	+	0	+	++	0	+	0	+	0	+	++	+	++	++	++
	DME 3 Office Development	<p>The policy continues to prioritise the location of office space in highly accessible Office Growth Locations, such as Stockley Park, Uxbridge and the Heathrow Perimeter, and ensures that office development will be located in areas most suited with appropriate servicing. The primary concern with this approach is that it directs high trip-generating development to locations within the Air Quality Management Area, where air quality is already poor. In doing so the policy sets out the circumstances under which loss of office floorspace in Office Growth Locations and designated town centres will be acceptable, taking account of recent changes to permitted development rights. Although the policy has undergone substantial revision in terms of wording, the amendments made do not significantly alter the policy's sustainability effects. It continues to perform strongly against all of the economic objectives and some of the social objectives.</p>																
		-	+	++	0	/	/	0	0	0	0	0	-	/	+	+	+	+
	DME 4 Visitor Attractions	<p>The policy has been strengthened through inserting active encouragement of new visitor to heritage and other sites, thereby addressing Policy 4.6 (d) of the London Plan, although no specific reference is made to Colne Valley. This is particularly important given that Part 1 includes requirements to encourage visitors to the Colne Valley Park. This could be referenced in the supporting text or in the policy. In addition, former criteria v and vi have been omitted to avoid repetition.</p> <p>Advisory Comment 1: The policy could be expanded to consider encouraging the provision of visitor attractions, particularly in reference to the Colne Valley which is an objective of Part 1.</p>																

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
	DME 5 Hotels and Visitor Accommodation	-	0	0	0	0	+	0	-	0	0	+	-	0	+	++	++
<p>This is predominantly an economic based policy albeit with requirements for good quality design. It has been amended to exclude former criterion iv) to take account of the changes in national housing standards as well as criterion v requiring planning obligations for employment generating development to avoid repetition. Importantly though, it is acknowledged that this policy is unlikely to result in improvements to air quality and may have detrimental impacts by virtue of increasing the amount of visitors particular around Heathrow.</p> <p>Advisory Comment 2: Specific air quality criteria could be included particularly given the baseline air quality position around Heathrow.</p>																	
DME 6 Accessible Hotels and visitor Accommodation	0	0	0	0	0	0	0	0	0	0	++	0	0	+	0	0	0
<p>This policy has been amended to include reference to the Accessible Hillingdon SPD, provide clarity that criterion B is applicable to proposals of 10 rooms or more and reduce the amount of detail provided in criterion B iii, thereby providing more generic wording making reference to appropriate facilities for a wide range of disabilities. The amendments made do significantly alter the sustainability effects of the policy, which continues to make suitable provision for the inclusion of accessibility within hotels and visitor accommodation and score strongly against the accessibility sustainability objective.</p>																	

Sustainability Appraisal Objectives

Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
<p>DMTC 1 Town Centre Developments</p>	-	0	+	0	0	+	0	0	0	+	+	+	0	+	+	++	+
<p>This policy has been amended to include additional criteria requiring town centre development to demonstrate adequate width and depth of floorspace as well as servicing arrangements. In addition, the exception tests for town centre uses in out of centre locations have been reduced to solely include harm to residential amenity. Given the wide range of uses defined as town centre uses in the NPPF, this amendment increases concerns in terms of high trip-generating town centre uses and the associated effects on traffic generation and air quality. A new criterion C has been inserted setting out the sequential test for town centre uses, thereby promoting town centres as the focus for 'town centre uses' and therefore protects areas from having disparate, poorly connected and sprawling centres. However, it must be recognised that much of the town centres suffer from poor air quality and the policy therefore has the negative impact of intensifying development in these areas.</p>																	

Sustainability Appraisal Objectives																																			
Development Management Policies	Sustainability Appraisal Objectives																																		
DMTC 2 Primary and Secondary Shopping Areas	Sustainability Appraisal Objectives																																		
	<table border="1"> <thead> <tr> <th data-bbox="548 491 629 550">Air Quality</th> <th data-bbox="629 491 725 550">Biodiversity</th> <th data-bbox="725 491 822 550">Landscape & Heritage</th> <th data-bbox="822 491 904 550">Soil & Water</th> <th data-bbox="904 491 1001 550">Flood Risk</th> <th data-bbox="1001 491 1084 550">Efficient Land Use</th> <th data-bbox="1084 491 1180 550">Resources and Waste</th> <th data-bbox="1180 491 1263 550">Climate Change</th> <th data-bbox="1263 491 1359 550">High Quality Housing</th> <th data-bbox="1359 491 1456 550">Health, Noise, Safety, Crime</th> <th data-bbox="1456 491 1538 550">Accessibility</th> <th data-bbox="1538 491 1621 550">Traffic Reduction</th> <th data-bbox="1621 491 1718 550">Skills & Education</th> <th data-bbox="1718 491 1814 550">Design & Amenity</th> <th data-bbox="1814 491 1897 550">Economic Growth</th> <th data-bbox="1897 491 1980 550">Business Image</th> <th data-bbox="1980 491 2078 550">Provision of Jobs</th> </tr> </thead> <tbody> <tr> <td data-bbox="548 550 629 590">0</td> <td data-bbox="629 550 725 590">0</td> <td data-bbox="725 550 822 590">0</td> <td data-bbox="822 550 904 590">0</td> <td data-bbox="904 550 1001 590">0</td> <td data-bbox="1001 550 1084 590">0</td> <td data-bbox="1084 550 1180 590">0</td> <td data-bbox="1180 550 1263 590">0</td> <td data-bbox="1263 550 1359 590">0</td> <td data-bbox="1359 550 1456 590">-</td> <td data-bbox="1456 550 1538 590">0</td> <td data-bbox="1538 550 1621 590">0</td> <td data-bbox="1621 550 1718 590">0</td> <td data-bbox="1718 550 1814 590">0</td> <td data-bbox="1814 550 1897 590">++</td> <td data-bbox="1897 550 1980 590">+</td> <td data-bbox="1980 550 2078 590">+</td> </tr> </tbody> </table> <p data-bbox="568 555 2051 802">The policy has been amended to provide greater clarity in terms of the policy wording, but no material changes have been made to the policy direction. The policy seeks to retain frontages primarily in retail use and restricts the provision of other uses through thresholds. While this provides some economic flexibility, it is not clear how this policy will be applied in those centres where current A1 provision is already below the thresholds or where A1 units have remained vacant for long periods of time. Advisory comment 3 could not be taken into account due to difficulties in defining an appropriate distance to give meaning to the suggested terminology 'within close proximity to schools'. However, there is scope for the policy to consider recent impact studies on hot food outlets such as the GLA's Takeaway Toolkit as well as the growing problem of obesity.</p> <p data-bbox="568 842 1012 874">See Advisory Comment 3 for DMTC4</p>	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs	0	0	0	0	0	0	0	0	0	-	0	0	0	0	++	+	+
Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs																			
0	0	0	0	0	0	0	0	0	-	0	0	0	0	++	+	+																			

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMTC 3 Maintaining the Viability of Local Centres and Local Parades	0	0	+	0	0	+	0	0	0	-	+	0	0	/	+	++	+
<p>This policy has been amended to provide greater clarity/detail and include a new policy criterion into A, which requires hot food take away to be limited to 15 % of the frontage. In addition, former criterion A ii requiring new proposals to be consistent with the scale and function of the local centre has been deleted. This weakens the policy's previous performance against the design and amenity sustainability objective. However, overall the policy makes broadly suitable provision for local centres and parades, ensuring that Local Centres are still the focus for A1 uses and therefore protects areas from having disparate, poorly connected and sprawling centres. However, as for DMTC2, the policy does not recognise existing under provision of A1 uses in these locations, and is it not clear how this policy will be applied in centres/parades where current A1 provision is already below the thresholds or where A1 units have remained vacant for long periods of time. It is recommended that the GLA's Takeaway Toolkit is considered in relation to A5 hot food outlets particularly near schools.</p> <p>See Advisory Comment 3 for DMTC4</p>																	

Sustainability Appraisal Objectives

Development Management Policies	Sustainability Appraisal Objectives																
	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMTC 4 Amenity and Town Centre Uses	0	0	0	0	0	0	0	0	0	+	0	0	0	+	+	+	0
	<p>The primary amendment to this policy involves the deletion of former criterion B requiring that proposals for hot food take ways, betting shops, drinking establishments, casinos and similar uses should be resisted. The criterion has been deleted as this policy issue has been integrated into the other town centre policies with further detail having been included into the supporting text, albeit the reference to proximity to schools and other sensitive community uses has not been reproduced. In the light of the changes made, the policy will continue to have a positive economic and health impact despite being quite broad nature. The Council could consider the GLA's Takeaway Toolkit and the potential for explicit restrictions near to schools in particular.</p> <p>Advisory Comment 3: This policy could be expanded to consider the research contained in the GLA's Takeaway Toolkit. The Policy could contain a provision for restricting further for proposals within close proximity to schools where appropriate.</p>																

Sustainability Appraisal Objectives																	
Development Management Policies	Sustainability Appraisal Objectives																
	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMH 3 Office Conversions	0	0	0	0	0	+	0	0	0	0	0	0	0	+	0	0	0
<p>The policy has been amended to take account of recent changes to permitted development rights and makes explicit that the policy now only applies to office conversions that fall outside permitted development rights. Part B of the policy additionally has been updated to refer new national space and parking standards. The amendments made do not significantly alter the sustainability effects of the policy.</p> <p>Advisory comment 4: These policies should be expanded to be more specific about the quantity and type of amenity space acceptable. Offsite contributions must be referred if onsite provision is not possible. This is particularly necessary given that the evidence base alludes to a lack of accessible amenity and recreation space in some areas of the borough.</p>																	

Sustainability Appraisal Objectives

Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
<p>DMH 4 Residential Conversions and Redevelopment</p>	-	0	0	0	0	0	0	0	+	0	0	0	0	+	0	0	0
<p>The policy has been amended to provide greater clarity and include 2 additional tests to be considered in determining whether residential conversion is appropriate. These include an internal floor area of at least 120 sqm and that units are limited to one per floor for residential conversions. Amendments made help to ensure that residential redevelopment or conversions achieve appropriately sized units and amenity space, which strengthen the policies performance against the housing sustainability objective.</p> <p>Advisory comment 5 (as above): These policies should be expanded to be more specific about the quantity and type of amenity space acceptable. Offsite contributions must be referred if onsite provision is not possible. This is particularly necessary given that the evidence base alludes to a lack of accessible amenity and recreation space in some areas of the borough.</p>																	

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMH 6 Garden and Back land Development	0	+	+	0	0	0	0	0	0	0	0	0	0	+	0	0	0
<p>The policy has been amended to omit former criterion i) requiring rear garden land that contributes to amenity and provides wildlife habitat must be retained to avoid duplication. Evidence from Greenspace Information for Greater London shows that the loss garden space significantly contributes to the reduction in wildlife, particularly in urban settings. The policy provides support for ensuring biodiversity is protected. The following Advisory Comment is provided to give further weight to biodiversity protection.</p> <p>Advisory Comment 6: The policy could be strengthened to reflect the National Planning Policy Framework objective to provide a net gain for biodiversity from new development. The following bullet point is recommended: 'Proposals demonstrate a net gain in biodiversity value' (see Recommendation 1 which relates to a broader biodiversity policy)</p>																	
DMH 7 Provision of Affordable Housing	0	0	0	0	0	0	0	0	++	+	+	0	0	+	0	0	0
<p>The policy has been amended to provide greater clarity and comply with recent changes in government guidance, which prevents affordable housing being sought on small sites. Former policy criterion D iv has therefore been deleted. The changes made do not significantly alter the sustainability effect of the policy. It continues to promote and provide for equality in housing provision within the Borough.</p>																	

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
	DMH 8 Sheltered Housing and Care Homes	0	0	0	0	0	0	0	0	++	+	+	0	0	+	0	0
The policy has undergone minor editorial change and former criterion A iii referring to space standards has been deleted in the light of recent national standards that have taken effect. This policy continues to provide for sheltered housing in an appropriate manner, scoring strongly against the social sustainability objectives.																	
DMHB 1 Heritage Assets	0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
The policy has been amended to include editorial changes and 2 new policy criteria requiring a positive contribution to local character and distinctiveness of the area and the repair and reuse of listed buildings and conservation areas at risk. The amendments made further strengthen the policy's contribution towards the achievement of the sustainability objective relating to landscape and heritage. This policy continues to protect the heritage assets of the borough and reflects the need to consider the balance between heritage protection and achieving design standards that meet future environmental targets.																	

Development Management Policies		Sustainability Appraisal Objectives																
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMHB 2 Listed Buildings		0	0	++	0	0	0	0	/	0	0	0	0	0	0	0	0	0
		<p>It is assumed that the caveat in DMHB1 (Part B) which applies to heritage assets inherently includes Listed Buildings. The policy wording has been amended to reflect the NPPF and strengthen the policy's ability to protect and enhance listed structures. Amendments made increase the policy's contribution towards the achievement of the heritage sustainability objective.</p> <p>Advisory comment 7: Include a caveat (similar to DMHB1) relating to sustainable design and energy efficiency.</p>																
DMHB 3 Locally Listed Buildings		0	0	++	0	0	0	0	/	0	0	0	0	0	0	0	0	0
		<p>It is assumed that the caveat in DMHB1 (Part B) which applies to heritage assets inherently includes Locally Listed Buildings. The policy wording has been amended substantially to reflect the NPPF and strengthen the policy's ability to protect and enhance locally listed structures. In addition a policy criterion has been included to allow for the replacement of a locally listed building, where community benefits outweigh those of retention in accordance with the NPPF. Amendments made increase the policy's contribution towards the achievement of the heritage sustainability objective.</p> <p>Advisory comment 7 (as above): Include a caveat (similar to DMHB1) relating to sustainable design and energy efficiency.</p>																

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
		0	0	++	0	0	0	0	/	0	0	0	0	0	0	0	0
DMHB 4 Conservations Areas	<p>It is assumed that the caveat in DMHB1 (Part B) which applies to heritage assets inherently includes Conservation Areas. The policy wording has been amended to reflect the NPPF and strengthen the policy's ability to protect and enhance listed structures. The reference in criterion C has been deleted to avoid duplication of a statutory requirement.</p> <p>Advisory comment 7 (as above): Include a caveat (similar to DMHB1) relating to sustainable design and energy efficiency.</p>																
	0	0	++	0	0	0	0	/	0	0	0	0	0	+	0	0	0
DMHB 6 Gatehill Farm Estate and Copse Wood Estate Areas of Special Local Character	<p>It is assumed that the caveat in DMHB1 (Part B) which applies to heritage assets inherently includes these listed areas. Although a policy criterion relating to development on the south-east side of Ducks Hill Road, which should reinforce existing landscaping, has been deleted to avoid repetition of criterion v, the policy continues to protect the archaeology of the borough suitably and it is considered that the amendments made do not alter the sustainability effects of the policy.</p> <p>Advisory comment 7 (as above): Include a caveat (similar to DMHB1) relating to sustainable design and energy efficiency.</p>																

Development Management Policies		Sustainability Appraisal Objectives																
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMHB 9 War Memorials		0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
		<p>This policy protects and makes provisions for war memorials. It has been amended to include the general presumption in favour of retention and require full justification for alterations, removal and relocation of war memorials, strengthening the level of protection set out in this policy. The amendments made further strengthen the policy's ability to protect war memorials and significantly strengthens its positive contribution towards heritage and landscape objective.</p>																

Sustainability Appraisal Objectives

Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMHB 10 High Buildings and Structures	-	/	/	/	/	/	0	/	/	0	++	-	0	+	0	0	0
	<p>This policy has undergone substantial amendments. The policy has been amended to include additional criteria, strengthen and clarify requirements in relation to preferred location (Uxbridge and Hayes), accessibility, integration with the local street network, open spaces and surrounding townscapes. In addition, in line with the advisory comments the environmental considerations for high structures have been integrated into other policies in the Plan; and thus deleted from this policy. The amendments further improve the policy's performance in relation to the accessibility and design sustainability objectives; however, the policy's contribution towards the majority of environmental sustainability objectives will continue to depend upon implementation.</p> <p>Advisory comment 7: the policy could be revised to include all environmental matters with an emphasis on air quality. Alternatively, environmental factors could be left to other policies</p>																
DMHB 11 Design of New Development	0	0	++	0	0	0	0	0	0	0	0	0	0	++	0	0	0
	<p>This policy sets out generic design aspirations that reiterates and reflects the requirements of Part 1, the London Plan and the National Planning Policy Framework. It has been amended to provide greater detail and explanatory examples, and 2 additional criteria have been included that seek to minimise amenity impacts, require landscaping and tree planting as well as waste storage. The amendments have further strengthened the policy's performance in relation to the sustainability objectives 'Design and Amenity' and 'Landscape and Heritage', but otherwise not significantly altered the sustainability effect of the policy.</p>																

Development Management Policies	Sustainability Appraisal Objectives																
	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMHB 12 Streets and Public Realm	0	0	++	0	0	0	0	0	0	++	++	0	0	++	0	+	0
	The policy has been amended to provide greater detail, clarity and to include additional criteria relating to the provision of safe pedestrian and cycle movement, landscaping, public art and inclusive design. Previous policy criterion D has been rationalised and included into policy DMHB 13 Shopfronts to avoid repetition. Amendments made further strengthened the policy's performance in relation to the social sustainability objectives.																
DMHB 13 Shopfronts	0	0	++	0	0	0	0	0	0	0	++	0	0	++	0	++	0
	This policy has been rationalised and consolidated to pull together all policy issues relevant to shopfronts and advertisements from previous policy DMHB 14 Streets and Public Realm and DMTC 5 Shopfronts. The policy sets out the Council's aspirations for high quality design of shopfronts and scores positively against heritage, accessibility, design and business image sustainability objectives.																
DMHB 14 Trees and Landscaping	++	++	++	0	+	0	0	0	0	0	0	0	0	++	0	0	0
	This is a new policy that requires all new development to provide, retain or enhance landscaping. The policy also requires a tree survey if existing trees are affected and, where this identifies trees of merit, an arboricultural statement. Scoring positively against most environmental objectives, the policy is likely helping to improve air quality, reduce flood risk and increase biodiversity. It has little or no relevance to the social and economic objectives.																

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
	DMHB 18 Private Outdoor Amenity Space	0	0	++	0	0	0	0	0	++	+	0	0	0	++	0	0
	<p>The policy makes suitable provision for amenity space. The policy has been amended to require private open space in Conservation Areas, Areas of Special Local Character and Listed Buildings to enhance the street scene and ensure design, materials and height of development of all development is in keeping with the character of the area. The amendments made strengthen the policy's contribution to the provision of high quality housing, design and amenity as well as heritage. However, the policy should be linked to earlier policies on residential conversions and housing in multiple occupation. There is no likely impact on the economic sustainability objectives.</p>																
DMHB 19 Play Space	0	0	0	0	0	0	0	0	+	+	+	0	+	++	0	0	0
	<p>This is a progressive policy that scores well against a range of sustainability objectives. Advisory comment 9 has been taken into account in amending the policy and further clarification has been included in relation to the number of child occupants that trigger the requirement for on or offsite provision in new development. In addition, the policy is now applicable to all major residential development and ensures that contributions to a play space provision, either onsite or offsite, will be made by all proposals of 10 units or more. Amendments made further increase the policy's contribution towards the social sustainability objectives.</p> <p>Advisory Comment 9: The policy could be strengthened to ensure that all major residential developments contribute to a play space provision, either onsite or offsite. This would allow plan to not only meet future demand but to ensure the current deficiencies are also addressed.</p>																

		Sustainability Appraisal Objectives																
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
Development Management Policies		0	0	++	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	DMHB 21 Telecommunications	The policy has been amended to include a further criterion requiring that telecommunications development does not have any adverse impact on heritage assets. A further criterion has been reworded for greater clarity. Amendments made further strengthen the policy's contribution to the 'landscape and heritage' sustainability objective. There is no relationship between the policy and all other sustainability objectives, except the design and amenity objective.																
		+	+	+	+	+	0	+	+	++	+	+	0	+	++	-	0	0
	DMEI 1 Living Walls and Roofs and Onsite Vegetation	The policy makes suitable provision for Living Walls and Roofs although there is no reference to biodiversity, climate change, water resources, or flood risk in the policy. However, amendments have been made to the supporting text, which now includes reference to the environmental benefits and sets out a rationale why Living Walls and Roofs are being sought. Advisory Comment 8: The policy could be expanded to refer to Living Screens which are a much cheaper and more viable alternative to living walls. As such they are more likely to be feasible. The supporting text could be expanded to link the benefits of livings walls and roofs with air quality improvements. This would provide greater justification for their use in air quality management areas and provide a stronger basis for their implementation during the development of planning proposals.																

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
	DMEI 2 Reducing Carbon Emissions	+	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0
<p>This policy solely relates to carbon emissions and reflects the requirements of Part 1 and the London Plan. The advisory comments resulting from the previous sustainability appraisal of this policy have been taken into account. The supporting text has been amended to provide greater detail in relation to off-site contributions, where a reduction targets for carbon emissions cannot be achieved on site. Greater clarity has also been provided in relation to criterion C to make explicit that contributions will be sought in £/tonne over the lifetime of a development.</p> <p>Advisory Comment 10: The Policy or supporting text could be expanded to address the cost for offsite contributions and how the funds will be spent by the authority.</p>																	
DMEI 5 Development in Green Chains	0	+	++	0	0	0	0	0	0	0	0	0	0	+	0	0	0
<p>This policy suitably protects the green chains and has been amended to require proposed development to result in net environmental gain through the inclusion of criterion B in accordance with the National Planning Policy Framework.</p> <p>Advisory Comment 11: The policy could be expanded to ensure development will only be supported where it results in a net environmental gain. The policy could require new development, where appropriate, to contribute to the All London Green Grid relevant to the scale and nature of the development.</p>																	

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMEI 6 Development in Green Edge Locations	0	+	++	0	0	0	0	0	0	0	0	0	0	+	0	0	0
<p>This policy has been amended to make explicit that green edge locations include locations adjacent to Green Belt, MOL, Green Chains, SINCs and Nature Reserves. The policy makes suitable provision for minimising the impact of development in green edge locations through extensive peripheral landscaping.</p> <p>Advisory Comment 12: The policy could be expanded to ensure development will only be supported where it results in a net environmental gain.</p>																	
DMEI 7 Biodiversity Protection and Enhancement	/	++	+	0	/	0	0	+	0	0	0	0	0	+	0	0	0
<p>This policy has been strengthened to ensure protection of all biodiversity features, which increases the policy's contribution to the biodiversity sustainability objective. The policy has also been revised to ensure that it requires a net environmental gain in line with the National Planning Policy Framework.</p>																	

Sustainability Appraisal Objectives	
Development Management Policies	Air Quality Biodiversity Landscape & Heritage Soil & Water Flood Risk Efficient Land Use Resources and Waste Climate Change High Quality Housing Health, Noise, Safety, Crime Accessibility Traffic Reduction Education Skills & Amenity Design & Amenity Economic Growth Business Image Provision of Jobs
DMEI 8 Waterside Development	0 + + 0 + 0 0 0 0 0 0 0 0 + 0 0 0 <p>This policy has undergone substantial amendments, including the addition the specification of development distances from main rivers and water courses, requirements for environmental enhancements and restoration of culverted sections of rivers and watercourses and off-site contributions where appropriate. In addition, requirements to protect wharves and enhance waterside biodiversity have been included as well as an additional criterion to ensure that proposals that fail to secure feasible enhancements or deculverting will be resisted. The amendments made strengthen the policy's performance against the flood risk, biodiversity, landscape and amenity sustainability objective. Importantly though it needs to reflect and reference the Blue Ribbon Network so that the vision of that plan can be delivered through the Part 2 development control policies. The policy should also reference the All London Green Grid SPD and provide the link with the Blue Ribbon Network.</p> <p>Advisory Comment 13: The policy could be revised so that it reflects the specific requirements of the All London Green Grid and the Blue Ribbon Network. By reflecting these 'other plans and programmes' more closely, the policy will be strengthened in relation to the sustainability objectives.</p>

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
	DMEI 9 Management of Flood Risk	0	0	0	+	++	0	0	0	0	0	0	0	0	+	0	0
<p>This policy is broadly compliant with other plans and programmes. An additional criterion has been inserted to ensure that development in Flood Risk Zone 3b is wholly restricted to essential infrastructure and water compatible uses and an FRA is submitted for such proposals. While the amendments made ensures that Development in flood zone 3b is entirely resisted for 'incompatible' types of development, the policy does not reference the sequential test or exception test set out in the guidance. Whilst the NPPF and Part 1 reference the sequential test, this policy needs to provide a direct reference back to the other documents.</p>																	
DMEI 10 Water Management, Efficiency and Quality (SUDS)	0	0	0	+	++	0	0	+	0	0	0	0	0	+	0	0	0
<p>This policy has been rationalised to consolidate former policies DMEI 14 Water Efficiency, DMEI 15 Water Efficiency in Homes and DMEI 16 Water Efficiency in Non-Residential Development and DMEI 11 Water Management (SUDS) in response to the advisory comments. It has been amended to omit the requirement for all developments to include at least 'at source' SUDS measures and to ensure that the requirement for development to be designed to reduce surface water run-off rates applies additionally to minor development in Critical Drainage Areas and areas identified at risk from surface water flooding. An additional requirement for rain gardens and non-householder developments to be designed to reduce surface water run-off rates, all developments to be drained by SUDs system and methods to avoid pollution of the water have been included. These amendments further strengthen the policy's performance against the Flood Risk and Water and Soil sustainability objectives. However, links between biodiversity enhancements and SUDS are not clearly referenced in the policy. Furthermore, development in critical drainage areas needs to be given higher priority. Critical drainage areas are defined as</p>																	

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
		<p>being the most at risk regarding surface water flooding. Development in these areas must be likened to development in flood zone 3 and must be treated accordingly. The policy also neither makes reference to Source Protection, nor considers aquifers and other groundwater features. It could be expanded to protect the quality of all controlled waters.</p> <p>Advisory Comment 14: The policy could include the objective for all new development to result in net-benefits for surface water flooding and could then be expanded to ensure all built development (not just major) within critical drainage areas reduce the run-off to the levels. The policy could also explicitly link SUDS to landscape and biodiversity provision and require developers to integrate drainage proposals into landscaping and for biodiversity enhancements.</p>															
DMEI 12 Development of Land Affected by Contamination	0	0	0	+	0	+	+	0	0	+	0	0	0	0	0	0	0
	<p>This policy has been amended to require all development proposals on potentially contaminated sites to be accompanied by an initial study of likely contaminants and where potentially harmful levels are identified full investigation and remediation proposals will be expected prior to approval. Advisory Comment 16 has been taken account of in the amendments to policy DMEI 10 Water management, Efficiency and Quality. The policy broadly makes suitable provision for development on contaminated land and amendments made further strengthen the policy's performance against the relevant environmental sustainability objectives and the health sustainability objective.</p>																

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
		++	0	+	++	/		++	0	0	+	0	0	0	0	0	0
DMEI 13 Importation of Waste Material	<p>This policy has been newly included. It makes suitable provision for development that includes important waste materials and ensures that appropriate environmental protection and safeguards are implemented to prevent adverse impacts from waste importation. The policy requires that proposals are accompanied by a monitoring plan, setting out material types, disposal timetables, on-site precautions and methods for reporting on progress of disposal; and that a written report is submitted on commencement, including types and quantities, sources of waste and details of the importing companies. The policy performs most strongly against the waste and resources and soil and water sustainability objectives, but also scores positively against the landscape sustainability objective. It has no relationship to all the economic and social sustainability objectives, except the health sustainability objective against which the policy scores positively.</p>																

Development Management Policies		Sustainability Appraisal Objectives																	
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs	
DMEI 18 Air Quality		++	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0	
		<p>Air quality is one of the biggest environmental issues for the borough. Much of the borough is designated as an air quality management area with many of the major roads exceeding minimum air quality standards (set at EU level). This policy has been strengthened to ensure developers actively contribute to air quality management and include sufficient mitigation to ensure there is no unacceptable risk from air pollution. The target of air quality neutrality is supported, but it is not clear from the supporting text what this means. The policy could also refer to green travel plans, and contributions from developers for the provision of offsite measures to improve air quality.</p> <p>Advisory Comment 17: The policy could be expanded to make it a requirement for developers to place air quality improvements at the heart of green travel plans and for contributions to be sought from developments that result in a net increase in air quality impacts. The policy could include support for additional vegetation through living walls and roofs, and include provisions for offsite measures to improve air quality if onsite measures cannot be delivered.</p>																	

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
	MIN 1 Safeguarded Areas for Minerals and Aggregates Railheads	0	0	0	0	0	0	++	0	0	0	0	0	0	0	0	0
	The policy makes suitable provision for minerals sites. It has been amended to include additional criteria safeguarding gravel and sand reserves as well as the existing railheads at Hayes, West Drayton, and West Ruislip from alternative use. Therefore the policy scores positively against the resource sustainability objective, but bears no relationship to any of the other environmental, social and economic sustainability objectives.																
MIN 2 Prior Extraction	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
	The policy makes broadly suitable provision for the protection of minerals sites. It has been amended to omit criterion ii) and include an additional criterion providing greater flexibility where an overriding community need for the proposed development outweighs the need for the mineral resource. The amendments essentially add another exception test to the general policy principle requiring prior extraction where surface development is proposed on safeguarded sites, thereby weakening the policy's																

Development Management Policies	Sustainability Appraisal Objectives																
	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
MIN 3 Extraction, Landfilling and Restoration	0	+	+	+	+	0	++	0	0	+	0	0	0	0	/	0	0
	The policy makes broadly suitable provision for the operation and after-use of minerals sites, consolidating and pulling together previous policies MIN 4 Minerals Capacity, MIN 5 Use of Farmland, MIN 6 Water Areas, MIN 7 Ready Mixed Concrete Plants, MIN 8 Landfill, MIN 9 Effects on the Local Hydrogeological Regime and MIN 10 Noise Impacts. While the policy is much more generic in nature, it manages the environmental impacts of minerals development and the after-use of minerals sites in a more holistic manner, and therefore scores positively against most of the environmental sustainability objective. The policy has little relationship to most of the social objectives and economic sustainability objectives.																
MIN 4 Re-use and Recycling of Aggregates	0	0	0	0	0	0	++	0	0	0	0	+	0	0	0	0	0
	This policy is newly included and makes suitable provision for the re-use and recycling of construction, demolition and excavation waste. It encourages on-site reuse and recycling, thereby reducing the need to transport minerals, as well as the use of substitute or recycled materials in new development, scoring positively against resources and waste sustainability objective. It has no relationship to all of the economic and most social sustainability objectives.																

Development Management Policies		Sustainability Appraisal Objectives																
		Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMT 1 Managing Transport Impacts		++	0	0	0	0	0	0	+	0	++	++	++	0	0	0	0	0
		<p>This policy makes suitable provision for transport impacts. It has been amended to include a definition of major development by way of footnote insertion and to take account of associated air quality and noise impacts, thereby strengthening the policy's performance against the relevant social and environmental sustainability objectives, in particular the air quality and noise sustainability objective.</p>																
DMT 5 Pedestrians and Cyclists		+	0	0	0	0	0	0	0	0	+	++	++	0	0	0	0	0
		<p>This policy makes suitable provision for pedestrians and cyclists. It has been amended to include an additional policy criterion to ensure that new development retains and enhances existing pedestrian and cycle routes. The advisory comment 18, which suggest to specifically reference the Grand Union Canal, has not been taken into account as it is considered that the criterion B already makes reference to the Blue Ribbon network, which includes the Grand Union Canal.</p> <p>Advisory Comment 18: The policy could Include reference to the Grand Union Canal in part B of the policy as this contains an existing cycle highway that could benefit from significant improvements.</p>																

Sustainability Appraisal Objectives																	
Development Management Policies	Air Quality	Biodiversity	Landscape & Heritage	Soil & Water	Flood Risk	Efficient Land Use	Resources and Waste	Climate Change	High Quality Housing	Health, Noise, Safety, Crime	Accessibility	Traffic Reduction	Skills & Education	Design & Amenity	Economic Growth	Business Image	Provision of Jobs
DMT 7 Freight	+	0	0	0	0	0	0	0	0	0	0	+	0	0	+	0	0
	This policy has been amended to ensure that it applies to all proposals that generate a high number of trips in Part (A) and in line with advisory comment 20 to ensure that development proposals for logistics and freights include clear objectives to minimise the impacts on air quality. This improves the policy's performance against the air quality sustainability objective. Part (B) of this policy includes reference to the Blue Ribbon Network for freight. In Hillingdon the Blue Ribbon Network includes a number of smaller watercourses and rivers which are not appropriate for the movement of freight. Reference to the Blue Ribbon Network should be replaced by sole reference to the Grand Union Canal. The use of this for freight, particularly the Paddington Branch of the canal, has been identified by the GLA as having potential for the movement of freight. The policy should include support for large scale development on the Grand Union Canal to investigate the options for freight transportation.																
DMAV 1 Safe Operation of Airports	0	0	0	0	0	0	0	0	0	++	0	0	0	0	0	0	0
	The policy has been amended to omit criterion ii, requiring that development with the ability to adversely affect the movement of aircraft is not supported. This criterion has been deleted to avoid duplication with relevant National Safety Guidance. The makes suitable provision for the safe operation of airports.																
DMAV 2 Heathrow Airport	+	0	0	0	0	0	0	0	0	0	0	+	0	+	++	+	0
	This policy has been amended in line with advisory comment 21 to require consistency with the Air Quality policy DMEI 14 as well as reword the requirement for development to avoid detrimental impact on the local and strategic road network, which increases the policy's performance against the air quality and traffic reduction objective.																

10. Appraisal of Policies Conclusions

10.1. General Comments

- 10.1.1. In general, the policies score well against the sustainability objectives. The plan largely reflects other plans and programmes and also the baseline position set out in this report and objectives described in Part 1 of the Local Plan.
- 10.1.2. The appraisal has found that there are none of the policies require changes to ensure they are consistent with other plans or programmes or the wider national planning framework. However, there are a series of advisory comments that seek to strengthen the policies to reflect better against sustainability objectives.
- 10.1.3. The table below summarises the appraisal and provides an overall 'score' for each policy. The recommendations include specific policy rewording which could be adopted or provide the basis for a policy review. In addition the advisory comments are included under the relevant policy, and if followed will help the plan perform even more positively against the sustainability objectives. The x recommendations relate to Policies:

10.1.4. Table 7 Summary of Recommendations and Advisory comments

Economy			
DME 1	Employment Uses in Designated Sites		++
DME 2	Employment Uses Outside of Designated Sites		++
DME 3	Office Development		++
DME 4	Visitor Attractions	<i>Advisory comment 1 carried forward: The policy could be expanded to consider encouraging the provision, particularly in reference to the Colne Valley which is an objective of part 1, and not just controlling proposals.</i>	+
DME 5	Hotels and Visitor Accommodation	<i>Advisory comment 2 carried forward: It is recommended specific air quality criteria are included particularly given the baseline air quality position around Heathrow.</i>	+
DME 6	Accessible Hotels and Visitor Accommodation		++
DME 7	Farm Diversification		+

Town Centres			
DMTC 1	Town Centre Development		++
DMTC 2	Primary and Secondary	<i>Advisory comment 3 carried forward: These policies could be expanded to consider the research contained in</i>	+

Town Centres			
	Shopping Areas	<i>the GLA's Takeaway Toolkit. The Policy could restrict hot food outlets further than the proposed 15% of frontage (5% used in Waltham Forest) and set clear restrictions in relation to schools if applicable.</i>	
DMTC 3	Maintaining the Viability of Local Centres and Local Parades		
DMTC 4	Amenity and Town Centre Uses		

New Homes			
DMH 1	Safeguarding Existing Housing	<i>Advisory comment 4 carried forward: The policy should consider lower parking rations for subdivision in areas well served by public transport to reduce impacts on air quality.</i>	+
DMH 2	Housing Mix		++
DMH 3	Office Conversions	<i>Advisory comment 5 carried forward: These policies should be expanded to be more specific about the quantity and type of amenity space acceptable. Offsite contributions must be referred if onsite provision is not possible. This is particularly necessary given that the evidence base alludes to a lack of accessible amenity and recreation space in some areas of the borough.</i>	+
DMH 4	Residential Conversions and Redevelopment		+
DMH 5	Houses in Multiple Occupation		+
DMH 6	Garden and Backland Development	<i>Advisory comment 6 carried forward: Policy 9 should be revised to include the following: 'Proposals for development in rear gardens must be accompanied by habitat studies that quantify the garden's value to wildlife. Gardens that are important to protected species or priority species described in biodiversity action</i>	+

New Homes			
		<i>plans will be discouraged from being developed. Where any wildlife habitat is removed as a result of rear garden development, the applicant should provide onsite provision and contribute to offsite provisions to ensure that there is a net gain in biodiversity.'</i>	
DMH 7	Provision of Affordable Housing		++
DMH 8	Sheltered Housing and Care Homes		++

Historic and Built Environment			
DMHB 1	Heritage Assets		++
DMHB 2	Listed Buildings	<i>Advisory comment carried forward: Include a caveat (similar to DMHB1) relating to sustainable design and energy efficiency.</i>	++
DMHB 3	Locally Listed Buildings		++
DMHB 4	Conservations Areas		++
DMHB 5	Areas of Special Local Character		++
DMHB 6	Gatehill Farm Estate and Copse Wood Estate		++
	Areas of Special Local Character		

Historic and Built Environment			
DMHB 7	Archaeological Priority Areas and Archaeological Priority Zones		++
DMHB 8	Registered Historic Parks, Gardens and Landscapes		++
DMHB 9	War Memorials		++
DMHB 10	High Buildings and Structures	<p><i>Advisory comment 7 has been partially implemented by deleting reference to the 'the human scale' and clarifying the meaning of 'microclimate' through examples.</i></p> <p><i>Advisory comment 7 partially carried forward: The policy could be revised to include all environmental matter with an emphasis on air quality. Alternatively, the environmental factors could be left to other policies.</i></p>	++
DMHB 11	Design of Development	<i>Recommendation 12 has been implemented through amalgamation with former policy DMHB13 Residential amenity.</i>	++
DMHB 12	Streets and Public Realm		+
DMHB 13	Shopfronts		++
DMHB 14	Trees and Landscaping		++
DMHB 15	Planning for Safer Places		++
DMHB 16	Housing Standards		+

Historic and Built Environment			
DMHB 17	Residential Density		+
DMHB 18	Private Outdoor Amenity Space		++
DMHB 19	Play Space	<i>Advisory comment 9 carried forward: The policy could be strengthened to ensure that all major residential developments contribute play space, either onsite or offsite, so as to not only meet future demand but to ensure the current deficiencies are also addressed.</i>	+
DMHB 20	Private Outdoor Amenity Space		++
DMHB 21	Moorings		+
DMHB 22	Telecommunications		+

Environmental Improvements			
DMEI 1	Living Walls and Roofs and Onsite Vegetation	<i>Advisory comment 8 carried forward: The policy should be expanded to include the justification as to why living walls and roofs are required, and to make them a particular requirement in air quality management areas. The Policy should require all roadside facing boundary treatment (e.g. fences and walls) in air quality management areas to include green screens to help improve air quality. The policy and supporting text should also refer to Living Screens as well as Living Walls.</i>	+
DMEI 2	Reducing Carbon Emissions	<i>Advisory comment 10 carried forward: The Policy or supporting text should be expanded to address the cost for offsite contributions and how the funds will be spent by the authority.</i>	++
DMEI 3	Decentralised Energy		++
DMEI 4	Development in the Green Belt or on		++

Environmental Improvements			
	Metropolitan Open Land		
DMEI 5	Development in Green Chains	<p><i>Advisory comment 11 partially implemented: Reference to the London Green Grid and the GLA SPG has been included in the supporting text in para 6.15.</i></p> <p><i>Advisory comment 11 partially carried forward: The policy should be expanded to ensure development will only be supported where it results in a net environmental gain. The All London Green Grid must be referenced within the policy and requirements should be set for new development to consider the GLA SPG. All new development must, where appropriate, contribute to the All London Green Grid relevant to the scale and nature of the development.</i></p>	+
DMEI 6	Development in Green Edge Locations	<p><i>Advisory comment 12 carried forward: The policy should be expanded to ensure development will only be supported where it results in a net environmental gain.</i></p>	+
DMEI 7	Biodiversity Protection and Enhancement	<p><i>The wording suggested by previous recommendation 1 has been partially implemented and taken on board. The policy refers to protection and enhancement of features of ecological value, but does not repeat NPPF wording in respect of net gain.</i></p>	+
DMEI 8	Waterside Development	<p><i>Advisory comment 13 has been partially implemented. Reference to the London Green Grid and the GLA SPG has been included in the supporting text in para 6.15. Reference to the Blue Ribbon Network policy EM3 in the Part 1 is made in para 6.34.</i></p> <p><i>Advisory comment 13 partially carried forward: The policy needs to be revised so that it reflects the specific requirements of the All London Green Grid and the Blue Ribbon Network. By reflecting these 'other plans and programmes' more closely, the policy will be strengthened in relation to the sustainability objectives.</i></p>	+
DMEI 9	Management of Flood Risk	<p><i>Recommendation 2 has been implemented: This policy has been expanded through criterion B to explain that development in flood zone 3b will be resisted and that it is treated differently to flood zone 3a. The policy</i></p>	

Environmental Improvements		
		<i>requires the application of the sequential test.</i>
DMEI 10	Water Management, Efficiency and Quality	<p><i>Advisory comment 14 has been partially implemented. The policy has been amended to ensure all built development (not just major) within critical drainage areas reduce run-off to the levels set out for major development.</i></p> <p><i>Advisory comment 14 is partially carried forward: The policy should include the objective for all new development to result in net-benefits for surface water flooding. The policy should also explicitly link SUDS to landscape and biodiversity provision and require developers to integrate drainage proposals into landscaping and for biodiversity enhancements.</i></p> <p><i>Recommendation 3 has been implemented through consolidating former DMEI 11, 12, 13, 14, 15 and 16 into new policy DMEI 10, eliminating the need for a separate water quality policy.</i></p> <p><i>Advisory comment 15 has been partially taken on board: All water efficiency measures have been merged and consolidated.</i></p> <p><i>Advisory comment 15 is partially carried forward: The policy should then be expanded to ensure new development achieves reductions in potable water through water efficient design and the reuse of collected water through grey water or rainwater harvesting (or both).</i></p>
DMEI 11	Protection of Ground Water Resources	<i>Recommendation 4 has not been implemented as the policy is worded intentionally generic to address and capture all types of development in all source protection zones.</i>

Environmental Improvements			
DMEI 12	Development of Land Affected by Contamination	<i>Advisory comment 16 has been taken on board and policy DMEI 9 has been reworded to include provision for groundwater protection in criterion C.</i>	+
DMEI 13	Importation of Waste Materials		++
DMEI 14	Air Quality	<i>Advisory comment 17 carried forward: The policy should be expanded to make it a requirement for developers to place air quality improvements at the heart of green travel plans and for contributions to be sought from developments that result in a net increase in air quality impacts. The policy should include support additional vegetation through living walls and roofs, and should include provisions for offsite measures to improve air quality if onsite measures cannot be delivered.</i>	+
MIN 1	Safeguarded Areas for Minerals and Aggregates Railhead		++
MIN 2	Prior Extraction		++
MIN 3	Extraction, Landfilling, Restoration		++
MIN 4	Re- use and Recycling of Aggregates		++

Community Infrastructure			
DMCI 1	Retention of Existing Community, Sport and Education Facilities		++
DMCI 2	New Community Infrastructure		++
DMCI 3	Public Open Space Provision		+
DMCI 4	Open Spaces in New Development		++
DMCI 5	Children's Play Areas		++
DMCI 6	Indoor Sports and Leisure Facilities		++
DMCI 7	Promoting Participation		++
DMCI 8	Planning Obligations and Community Infrastructure Levy		+

Transport and Aviation			
DMT 1	Managing Transport Impacts		+
DMT 2	Highways Impacts		++

DMT 3	Public Transport		++
DMT4	Pedestrians and Cyclists	<i>Advisory comment 18 carried forward: Include reference to the Grand Union Canal in part B of the policy.</i>	++
DMT 5	Vehicle Parking	<i>Advisory comment 19 carried forward: The policy should acknowledge the air (quality implications of a higher than London parking ratio and should include support for priority parking in new developments for low emissions vehicles and car sharing clubs. The policy needs to provide support for using the parking provision more innovatively given the implications for negative air quality impacts.</i>	+
DMT 6	Freight		+
DMAV 1	Safe Operation of Airports		++
DMAV 2	Heathrow Airport		+
DMAV 3	RAF Northolt		++

11. Conclusions

- 11.1.1. In general, the policies and sites scored well against the sustainability objectives. The plan largely reflects other plans and programmes and also the baseline position set out in the main report and the objectives described in Part 1 of the Local Plan.
- 11.1.2. The appraisal has found that none of the policies require changes to ensure they are consistent with other plans or programmes or the wider national planning framework. However, there are a series of advisory comments to strengthen the policies to reflect better against sustainability objectives.

12. Appendix 1: Links to SEA Directive

The information to be included in the Environmental Report	Relevant section in the report
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Introduction and Section 5
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Sections 5 and 6
c) The environmental characteristics of areas likely to be significantly affected;	Sections 5 and 6
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 5 and 6
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Sections 5 and 6
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, & fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Sections 8, 9 and 10
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;	Sections 8, 9 and 10
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;	Section 4
i) a description of measures envisaged concerning monitoring in accordance with Article 10;	Section 4
j) a non-technical summary of the information provided under the above headings.	Section 1

