



Part B - Please use a separate sheet for each representation

Name or Organisation: Brentford Community Council

3. To which part of the Local Plan does this representation relate?

Paragraph(s) Policy Figure/Site

4. Do you Consider the Local Plan is:

(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The government has set a target to reduce the emissions of greenhouse gases (CO2) in the UK by 80% from 1900 levels by 2050. This means that emissions must, on average, be reduced by 80% in each local authority area. There are also interim targets recommended by the Committee on Climate Change. We see nothing in the LP that explains what part LB of Hounslow will play in achieving these targets.

Part 1 makes only general references to climate change, and to the government target. But there is no indication of what contribution Hounslow intends make or of how much emissions are estimated to arise as a result of other policies in the LP.

The Sustainability Appraisal (SA) has only qualitative references to climate targets, and does not commit the council to quantifying the effect of the LP policies on future emissions of greenhouse gases.

Many sources of emissions are outside the control of the council. However, LP policies will affect emissions, notably house-building, transport and spatial planning generally. The SA



should be showing what effect LP policies will have on what components of the borough's emissions and what components of emissions are outside its control. In this way one could actually assess the impact of the LP.

It is stated in 10/10.4 (page 69) that Options 1 and 2 are "predicted to lead to significant positive effects in terms of climate change .." without specifying what the "positive effects" would actually be.

The quantitative information on emissions on page 30 only gives per capita emissions, and only historical data. There is no projection of future emissions for the borough.

The LP is unsound because it fails to assess Hounslow's contribution to UK emissions and its contribution to the UK target of 80% reduction by 2050.

(Continue on a separate sheet if necessary)

6. Please set out what modification (s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. *(NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination)*. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

"Our approach"

Add the text:

"We will set a target to reduce the emissions of greenhouse gases (CO₂) in the borough by 80% from 1900 levels by 2050"

"We will achieve this by"

Add the text:

"Monitoring the effect LP policies have on the borough's emissions alongside those emissions are outside our control. "

(Continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.



7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To explain the negative consequences of the text of the proposed policy wording

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:

Date: