



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.

Some 4,000 Londoners a year die prematurely from causes related to air pollution. Air pollution contributes to many health problems including asthma, heart disease and lung disease and lung cancer. The 'Public Health Outcomes Framework' estimates the "fraction of mortality attributable to particulate air pollution" in LB of Hounslow as an astonishing 7.1%.

Parts of Hounslow regularly breach UK and EU limits, set to protect human health. The World Health Organisation says both short- and long-term studies have found adverse health effects at concentrations that were at or below the current EU limit values. Leading scientists say there is evidence for a long-term effect of NO2 on natural mortality as high as that of PM2.5.

London has the highest levels of NO2 of any capital city in Europe and the UK has the highest proportion of zones breaching legal limits. Information obtained from Mayor Johnson shows that exhaust emissions from passenger cars (including private hire vehicles) of NO2 and dangerous airborne particles (PM2.5) are expected to rise from 39% and 49% of transport exhaust emissions respectively in 2010 to 47% and 54% respectively in 2015



The LP recognises that air pollution without quantifying it.

The SA states (page 9 of non-technical report): “*Significant negative effects are predicted in terms of air quality (on the basis that sensitive land uses will be directed to areas of poor air quality)*”.

The EU has recently launched the first stage of legal proceedings against the UK for persistent failure to address the air pollution limits in London. The process could result in large fines, which may be passed down to the London Mayor or the boroughs. It would be hard for LB of Hounslow to defend such action, given the lack of quantification and the lack of positive policies to reduce air pollution.

The LP is unsound because, while it recognises air pollution as an issue, there is no quantification of the issue in terms of pollution levels and there is no assessment of the health impacts of LP policies. This will make it hard for the borough to rebutt accusations that it has failed to address the problem and would make it hard to argue it should not be fined.

(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.

The SA should estimate the increases in air pollution due to new development, including that from the resultant road traffic. It should also estimate the existing and increased numbers of people exposed to the high levels of air in the areas of new development.

The LA should then, as necessary, control development to mitigate the problem.

(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: