

LDF Core Strategy Independent Examination

Matter 12 – Phasing, delivering and monitoring

Statement by Ealing Friends of the Earth (105), Brent River & Canal Society (175) and Ealing Wildlife Network (172)

Preliminary notes

As advised, the 3 organisations named have decided to combine their representations in order to save time and avoid duplication.

The single representation in this matter – 212 - is general and therefore does not fall within the ambit of just one of the Inspector's question. It is particularly pertinent to the Inspector's question 4.

Representation 212: Sustainable delivery

Our original response said “ There is very little, if any, mention of environmental impacts that are key components of sustainability. While energy is mentioned, there is no indication of the need to meet CO2 reduction targets. While transport is mentioned, there is no indication of the need to prevent ever-increasing road traffic. There is no mention of air pollution, despite its large health (and economic) impact.

Because these key components of sustainability are not addressed, the LDF is unsound.”

The council responded: “Many of these issues are in fact addressed through the LDF documents, although it is acknowledged that the spatial structure of the Development Strategy does not lend itself well to having discrete policies dealing with each aspect of sustainability. The plan recognises that planning has an important role to play in contributing to CO2 emission saving targets, although is only one of a number of mechanisms that can help deliver these savings. Detailed CO2 saving targets for individual development types are detailed in the emerging development management document. These are tailored to the type and scale of development. The plan seeks to promote a pattern of development which reduces the need to travel by car, and also seeks to promote opportunities to improve public transport. Air quality is addressed directly in relation to the spatial vision (Final Proposal 1.1)”

The council response does not address the objection. For example “*promote a pattern of development which reduces the need to travel by car*” is a far from actually preventing ever-increasing road traffic. Saying the “*The plan recognises that planning has an important role to play in contributing to CO2 emission saving targets*” is a far cry from playing that the plan fulfills its proper role in achieving 80% cuts by 2050. (See also representation 209 in Matter 2). Air pollution (euphemistically called air quality) is indeed referred to in Proposal 1.1 (j), but there is nothing that suggests air pollution standards will be met. (See also representation 210 in Matter 2).