

## Hounslow Green Party response to Hounslow council's Air Quality Action Plan consultation

This response answers question 1 of the consultation. For any inquiries relating to this response, please contact Tony Firkins, coordinator of Hounslow Green Party on 07739 196 606 or at [tony.firkins@gmail.com](mailto:tony.firkins@gmail.com).

### **Q1 How might we improve the draft Air Quality Action Plan?**

#### Nature of the consultation

The question implies there is a draft Air Quality Action Plan. No draft Air Quality Action Plan has been made available as part of the consultation. Instead a Revision of Hounslow's Air Quality Action Plan draft final report has been made available which contains discussion of a possible Air Quality Action Plan. This appears to be a stage away from a draft Air Quality Action Plan. We request that the consultation is re-opened when there is a draft Air Quality Action Plan available.

Unfortunately the report being consulted on is not suitable for consultation. It does not appear as if it was written for consultation. Information needs to be more accessible for proper public consultation. During the consultation requests were made for a public meeting in which the material could be consulted on in a more accessible way – but this did not occur. So again we request that the consultation is re-opened with a public meeting.

#### Lack of Funding

One of the reasons in the report given for the existing 2005 AQAP not resulting in compliance, 12 years on, is a lack of funding. Any new Air Quality Action Plan must have suitable funding in order to meet the objective of compliance. This did not seem to be appreciated in the drop in session in Brentford where the primary objective appeared to be to just do things which required low or no funding – with little concern about the primary objective of compliance.

#### Lack of quantitative assessment of measures

The report lacks quantitative measures of both costs and effectiveness of measures. Without these it is very unlikely that the plan will be effective in its primary objective of Hounslow becoming compliant to air pollution standards as soon as possible. At the drop in session in Brentford, it was suggested that it was too expensive for a borough to take on such quantitative measures. We recommend that this is re-addressed to see whether this can be done in conjunction with neighbouring boroughs who have similar challenges and can share the costs. Or it could be addressed in conjunction with similar work that has been done for the Heathrow consultation to predict levels of air pollution based on assumptions about measures that are taken in the borough (based on the AQAP) and outside it (based on their AQAPs) together with London wide approaches and national efforts. It is noted that the 2005 Hounslow AQAP does have quantitative assessments of the proposed measures.

#### Lack of qualitative assessment of measures

There is not even a qualitative assessment of cost and effectiveness for the proposed AQAP packages and actions in section 6.1. We request that you add the 3 columns as per the GLA recommendations: ease of delivery, magnitude of air quality benefits and priority level. It appears that for many of the proposed actions the magnitude of air quality benefits will be very small.

#### Lack of joined up thinking with 3<sup>rd</sup> runway consultation

Joined up thinking is even more important, in that the justification for the third runway is that it will be compliant with air pollution limits. This claim is justified on the assumption that nearby boroughs have clean air zones and zero emission zones (see page 26 of [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653775/2017-](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653775/2017-)

plan-update-to-air-quality-re-analysis.pdf). However it does not appear that this assumption is justified based on the Hounslow report being consulted on which does not even mention Clean Air Zones or Zero Emission Zones.

#### Lack of joined up thinking with Climate Change

As per page 46 of the report we support combining the Air Quality Action Plan with a plan for addressing Climate Change (as per Kensington and Chelsea) so that actions are joined up with clear targets for both. This will avoid measures being taken which may be good for air quality and bad for climate and vice versa.

#### Failure of 2005 AQAP

The report declares that 88 measures in the 2005 plan were too many. It is not the number of measures but more whether they have the desired impact. 88 proposed measures did not result in compliance. It is not clear why less proposed measures in this report will yield any better result.

#### Forecast to Reality mismatch and unclear assumptions

Figure 6 (on page 13 of the report) shows forecast estimates for 2020, with a general reduction in concentrations across the Borough, reflecting a 20% fall in emissions of NO<sub>x</sub> in Hounslow that is anticipated between 2013 and 2020. The report does not explain why a 20% reduction should occur. Indeed other figures in the report show an increase since 2013, not a decrease. It appears that the report and thus the measures proposed may be based on a false assumption.

Table 3 on page 16 of the report also shows the predicted 20% reduction in NO<sub>x</sub> from 2013 to 2020. As we approach 2018, it would be useful to have the actuals for 2017, to see whether the 20% reduction assumption is valid. In particular there is a predicted drop in aviation emissions to 2020 and beyond. The report does mention that the third runway is of particular concern – but it does not make it clear whether Table 3 has factored in the increase in air flights over Hounslow which would occur if there is a third runway.

There have been major changes to emissions predictions recently due to non-compliance of motor manufacturers with emissions regulations – especially for diesels. This has resulted in further consultation on the third runway – see

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653775/2017-plan-update-to-air-quality-re-analysis.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653775/2017-plan-update-to-air-quality-re-analysis.pdf) . It is not clear from this report whether the most recent emissions predictions (as used in the previous link) have been used in this report.

The latest predictions should be used and it should be clear which are being used in the report.

#### Lack of clarity on focus areas

In the report, on page 27, it states that “boroughs are required to have regard to the focus areas in their borough when devising their air quality action plans”. The report gives various lists and maps of focus areas – but it is not clear what are the focus areas being proposed for the new Hounslow AQAP. In particular the status of the whole A4/M4 corridor is unclear – particularly that in Brentford. This should be clarified to include all as a focus area.

#### Walking and cycling

The report is quite vague on what actions are to be taken to promote walking and cycling. This is particularly the case for focus areas. The AQAP should be clear on what is being proposed and how it will reduce air pollution in focus areas. The Mayor’s transport policy is to invest significant amounts of money and infrastructure to improve both public transport and infrastructure for walking and cycling. How is this manifested in Hounslow?

### Heathrow Airport

The proposed package on Heathrow airport (on page 51 of the report) is incredibly weak. It appears as if all Hounslow council is going to do is have passive liaison with Heathrow. We request that Hounslow council is much more active on behalf of Hounslow residents. Aviation is shown to be a very significant factor in NOx emissions in the borough overtaking vehicles in the 2020s (see table 3 of the report). Hounslow council need to take strong actions in the Heathrow package to stop the third runway exacerbating the already bad situation.

It will not help air pollution at all in the borough if all that happens is some people have some meetings and pass reports backwards and forwards.

### Public Transport

The report is clear that much of public transport is out of the scope of Hounslow council. However actions 6.2 and 6.4 in the TfL package envisage that Hounslow council will work with TfL to come up with a list of sites and actions to allow air quality compliance. We request that the AQAP is clear what actions Hounslow council will be proposing to TfL and what impact they are expected to have by what dates to allow rapid compliance.

### Absence of dates

One of the most important aspect of a plan are the dates. This report fails to set any date to milestones working towards a date when the AQMA is no longer required due to compliance being achieved across Hounslow. We request that you add dates leading towards compliance. Indeed this report pre-dates the UK plan for roadside NO2 and thus does not take note of the immediacy of dates expressed in this plan. For example see point 94 on page 30 of [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633270/air-quality-plan-detail.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf). We request that the Hounslow AQAP is aligned with dates in this plan.

### Great West Corridor Local Plan

Hounslow council are currently consulting on the Great West corridor. This plan seems to take no account of the proposed large amount of development and how this will impact compliance to air pollution in what is already a hot spot of air pollution and in what should be an Air Quality Focus Area. We request that the report is enhanced to address the large amount of development being proposed in areas which are air pollution non-compliant.

### Clean Air Zones

Add Clean Air Zones in Hounslow. There is no mention of this in the report. The Hounslow AQAP should consider [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/633270/air-quality-plan-detail.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf) which was published after the report but months before the Hounslow consultation. It would have made sense to have incorporated this national plan into the Hounslow consultation in some way.

### Ultra Low Emissions Zones

Add Ultra Low Emission Zone to extend across all of borough of Hounslow. There is no mention of ULEZ in the report at all.

### Zero Emission Zones

Add Zero Emission Zones (ZEs) to the report. Again the possibilities are not mentioned at all. These are covered in the mayor's strategy at [https://consultations.tfl.gov.uk/policy/mayors-transport-strategy/user\\_uploads/pub16\\_001\\_mts\\_online-2.pdf](https://consultations.tfl.gov.uk/policy/mayors-transport-strategy/user_uploads/pub16_001_mts_online-2.pdf). Again this was published at a similar date to the Hounslow report, but months before the Hounslow consultation. It would have

made sense to have incorporated this London plan into the Hounslow consultation in some way. Note that the Heathrow consultation [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/653775/2017-plan-update-to-air-quality-re-analysis.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/653775/2017-plan-update-to-air-quality-re-analysis.pdf) assumes that there will be ZEZs.

Lack of joined up Hounslow thinking with London and National

As with other aspects of this consultation, it leaves the consultee in Hounslow, without the necessary information to respond properly as the context of the report does not include reference to much that is happening elsewhere.