



**Friends of
the Earth**

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Planning application 17/02300/EIA

Dual carriageway through Luton Airport & New Century Park (part of Luton Enterprise Zone)

Material considerations

9 April 2019

On Mar 26 2019, Luton BC CEO Hazel Simmons wrote: *“as can be seen in the Agenda, the recommendation in Clause C (page 29) is to resolve to grant permission subject to referral to the Secretary of State following the expiry of the further consultation period. As such, further comments can be made until the April closing date and these will be reviewed prior to referral of the application.”*

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”

This application is NOT in accordance with Local Plan, so should NOT have been recommended for approval or passed by councillors. If Material Considerations were considered a reason for approval, it is our contention that these are outweighed by further Material Considerations.

Attachments which form part of this response:

- 1 FoE response to Century & Wigmore Park application Pt 1
- 2 FoE response to Century & Wigmore Park application Pt 2
- 3 FoE spoken response on 27 Mar 2019 transcript
- 4 Carolyn Cottier spoken response on 27 Mar 2019 transcript
- 5 Lawrence Patterson spoken response on 27 Mar 2019 transcript
- 6 LLAL Scoping Report Vol 1 28 Mar 2019 7 LLAL Scoping Report Vol 2 28 Mar 2019

8 David Gurtler internal briefing Mar 2018 – summary with FoE comments

Link to Dev Control agenda 27 Mar 2019 including David Gurtler report (C Park pp26-342)

Link to 2017 Air Quality Annual Status Report

9 Defra charts from 2015 and 2018 showing high air pollution

10 Carolyn Cottier comments to N Herts on Air Pollution in Luton

11 Air pollution in Luton hits illegal levels *published in Luton Herald 21 June 2018*

It is FoE's contention that points 1-11 below are Material Considerations.

The application should not be passed for the following reasons:

- 1) It should not be an EIA application, but a DCO (Development Consent Order).**
- 2) NPPF (Feb 2019): Law on 'Determining applications' is contravened**
- 3) The balance of harm has been ignored.**

- 4) Ten ways Luton Council hid information from or misled the people it represents, throughout the period of this application, betraying public trust.
- 5) The plan fails to take into account advice in both its own plan and national guidance on considering development proposals *Also see Section 12 below*
- 6) The plan fails to take into account advice in both its own plan and national guidance on conserving and enhancing biodiversity and the natural environment
- 7) The plan fails to take into account advice in both its own plan and national guidance on promoting healthy and safe communities
- 8) The plan fails to take into account advice in both its own plan and national guidance on making effective use of land
- 9) The plan fails to take into account advice in both its own plan and national guidance on air pollution, and in view of recent knowledge, to act, on serious health grounds
- 10) The plan fails to take into account advice in both its own plan and national guidance on climate change, and national momentum on need to act on climate
- 11) LLAL's publication (28 March 2019) ***Future Luton: making best use of our runway - statements and intentions must be taken into account*** (attachments 6 and 7)
- 12) The application fails, judged on criteria of the Local Plan Sustainability Appraisal
- 13) Comments made by FoE to the Inclusive Growth Commission

It is our contention that Friends of the Earth's objections alone are enough to refuse the application on many grounds. Little has changed since Mr Gurtler's damning internal advice In Mar 2018, except that a second airport terminal has been proposed for the same site.

We strongly believe that the unprecedented number of concerns expressed, often with great passion, in letters from over 400 objectors are not given sufficient weight.

In the Development Control agenda, (pp137-342) **over 200 pages are devoted to summaries in 6pt type of people's heartfelt objections. This tells the council that what it's planning has an unprecedented degree of unpopularity and would NOT be representing the town's residents.**

Dev Control agenda p204: "This is a wonderful public space and it would be a tragedy to lose it."

"I have used this park all my life, to take the dogs for a walk and meet up with friends after school and during half terms. The park has encouraged children to become individuals and to learn so much about nature and the environment in their local surroundings and for everyone to meet new people."

1) It should not be an EIA application, but a DCO (Development Consent Order).

New Century Park, and the dual carriageway through the airport to access it, is part of LTN Enterprise Zone, designated in 2015. It meets all the criteria for a Nationally Significant Infrastructure Project (NSIP) in PPG rules and under The Planning Act 2008 Section 14 as quoted in the attached evidence by Carolyn Cottier.

The application is for a 1.6 mile dual carriageway through the airport to Wigmore Park and Century Park fields, occupying the same footprint as the plan being proposed by the same applicant for major airport expansion (attachments 6 & 7). It should therefore be a DCO and must be looked at in great detail by the Planning Inspectorate on behalf of the Secretary of State.

Replying to Carolyn Cottier on 26 Mar 2019, LBC CEO Hazel Simmons said:

"In terms of the application being considered as part of the DCO process, the application was submitted in January 2018 and the DCO process has not formally commenced. As such, there is no planning reason not to determine the application in current form at this time, indeed failure to do so could result in legal action being taken by the applicants or appealing against non-determination of the application."

The applicant is LLAL, an offshoot of Luton Borough Council which the council set up, with the same CEO and staffed by councillors. LBC has loaned LLAL £500m. The application was submitted by LLAL to LBC. The likelihood of legal action being taken by the applicants is zero.

LLAL's 2-volume publication 'Future Luton' demonstrates that the DCO process is well under way, and Luton has done a lot of work on it. The Century / Wigmore Park application is on the same land, and national planning guidance Mrs Cottier quoted at the Development Control meeting on 27 Mar 2019 (attached) shows that its size and scale fully qualifies it as a DCO (Development Consent Order) application, rather than an EIA application, which receives less scrutiny.

The development is 94.70 hectares – (see application completed by David Gurtler at

[REDACTED]

See attached transcript of evidence given on 27 Mar by Carolyn Cottier.

Under the Planning Act 2008 Section 14, the PA17/02300/EIA application is highway-related development as defined in sub-section 1 of this Act and in Section 22, sub-sections 1 and 5, and it is of the size that categorises it by description and size as a highway-related NSIP.

PA17/02300/EIA is a Nationally Significant Infrastructure Project (NISIP). It must be submitted and dealt with as a Development Consent Order (DCO), or withdrawn.

If this is an EIA or DCO application, it contravenes Directive 2011/92/EU of the European Parliament and of the Council: [REDACTED]

(1) which has harmonised the principles for the Environmental Impact Assessment of projects by introducing minimum requirements, with regard to the type of projects subject to assessment, the main obligations of developers, the content of the assessment and the participation of the competent authorities and the public, and it contributes to a high level of protection of the environment and human health.

(7) Over the last decade, environmental issues, such as resource efficiency and sustainability, biodiversity protection, climate change, and risks of accidents and disasters, have become more important in policy making. They should therefore also constitute important elements in assessment and decision-making processes.

(10) The United Nations Convention on Biological Diversity ('the Convention'), to which the Union is party pursuant to Council Decision 93/626/EEC, requires assessment, as far as possible and as appropriate, of the significant adverse effects of projects on biological diversity, which is defined in

Article 2 of the Convention, with a view to avoiding or minimising such effects. Such prior assessment of those effects should contribute to attaining the Union headline target adopted by the European Council in its conclusions of 25-26 March 2010 of halting biodiversity loss and the degradation of ecosystem services by 2020 and restoring them where feasible.

(11) The measures taken to avoid, prevent, reduce and, if possible, offset significant adverse effects on the environment, in particular on species and habitats protected under Council Directive 92/43/EEC and Directive 2009/147/EC of the European Parliament and of the Council, should contribute to avoiding deterioration in the quality of the environment and any net biodiversity loss.

(13) Climate change will continue to cause damage to the environment and compromise economic development. In this regard, it is appropriate to assess the impact of projects on climate (for example greenhouse gas emissions) and their vulnerability to climate change.

(14) Following the Commission Communication of 23 February 2009 entitled 'A Community approach on the prevention of natural and man-made disasters', the Council, in its conclusions of 30 November 2009, invited the Commission to ensure that the implementation, review and further development of Union initiatives, take into consideration disaster risk prevention and management concerns as well as the United Nations Hyogo Framework for Action Programme (2005-2015) adopted on 22 January 2005, which stresses the need to put in place procedures for assessment of the disaster risk implications of major infrastructure projects.

(15) In order to ensure a high level of protection of the environment, precautionary actions need to be taken for certain projects which, because of their vulnerability to major accidents, and/or natural disasters (such as flooding, sea level rise, or earthquakes) are likely to have significant adverse effects on the environment. For such projects, it is important to consider their vulnerability (exposure and resilience) to major accidents and/or disasters, the risk of those accidents and/or disasters occurring and the implications for the likelihood of significant adverse effects on the environment. In order to avoid duplications, it should be possible to use any relevant information available and obtained through risk assessments carried out pursuant to Union legislation, such as Directive 2012/18/EU of the European Parliament and the Council and Council Directive 2009/71/Euratom, or through relevant assessments carried out pursuant to national legislation provided that the requirements of this Directive are met.

(16) For the protection and promotion of cultural heritage comprising urban historical sites and landscapes, which are an integral part of the cultural diversity that the Union is committed to respecting and promoting in accordance with Article 167(4) TFEU, the definitions and principles developed in relevant Council of Europe Conventions, in particular the European Convention for the Protection of the Archaeological Heritage of 6 May 1969, the Convention for the Protection of the Architectural Heritage of Europe of 3 October 1985, the European Landscape Convention of 20 October 2000, the Framework Convention on the Value of Cultural Heritage for Society of 27 October 2005 can be useful. In order to better preserve historical and cultural heritage and the landscape, it is important to address the visual impact of projects, namely the change in the appearance or view of the built or natural landscape and urban areas, in environmental impact assessments.

(22) In order to ensure a high level of protection of the environment and human health, screening procedures and environmental impact assessments should take account of the impact of the whole project in question, including, where relevant, its subsurface and underground, during the construction, operational and, where relevant, demolition phases.

(28) The selection criteria laid down in Annex III to Directive 2011/92/EU, which are to be taken into account by the Member States in order to determine which projects are to be subject to environmental impact assessment on the basis of their significant effects on the environment, should be adapted and clarified. For instance, experience has shown that projects using or affecting valuable

resources, projects proposed for environmentally sensitive locations, or projects with potentially hazardous or irreversible effects are often likely to have significant effects on the environment.

(31) The environmental impact assessment report to be provided by the developer for a project should include a description of reasonable alternatives studied by the developer which are relevant to that project, including, as appropriate, an outline of the likely evolution of the current state of the environment without implementation of the project (baseline scenario), as a means of improving the quality of the environmental impact assessment process and of allowing environmental considerations to be integrated at an early stage in the project's design.

(35) Member States should ensure that mitigation and compensation measures are implemented, and that appropriate procedures are determined regarding the monitoring of significant adverse effects on the environment resulting from the construction and operation of a project, inter alia, to identify unforeseen significant adverse effects, in order to be able to undertake appropriate remedial action. Such monitoring should not duplicate or add to monitoring required pursuant to Union legislation other than this Directive and to national legislation.

(36) In order to stimulate more efficient decision-making and increase legal certainty, Member States should ensure that the various steps of the environmental impact assessment of projects are carried out within a reasonable period of time, depending on the nature, complexity, location and size of the project. Such time-frames should, under no circumstances, compromise the achievement of high standards for the protection of the environment, particularly those resulting from Union legislation on the environment other than this Directive, and effective public participation and access to justice.

East of Luton area needs a Strategic Environmental Assessment, not only an Environmental Impact Assessment which is something less, and does not go into the required detail of the SEA Directive. Part of the SEA (a principle in public law for large projects) is “the precautionary principle”, which recognises a social responsibility to protect the public from exposure to harm, when scientific investigation has found a plausible risk.

These protections can be relaxed only if further scientific findings emerge that provide sound evidence that no harm will result. An SEA would be done if the applications for a dual carriageway through the airport and New Century Park, part of a wider Enterprise Zone, were treated as a DCO application as they MUST be. (Carolyn Cottier evidence). It is clear that LBC/LLAL are trying to avoid such scrutiny.

An EIA (Environmental Impact Assessment) application must ensure that environmental, social and health impacts are included in decision-making. At 94 hectares, It's a Nationally Significant infrastructure Project (NSIP) so must go to govt.

EIA is supposed to make the decision-making process transparent and promote public involvement. It should list all aspects of the environment that may be affected, like REDACTED flora, air, soil, water, humans, and landscape, and screen out environmentally-unsound projects. The effects on all these should have stopped this idea long before it got to a planning application.

An EIA looks for suitable mitigation. The Local Plan says *“Mitigation will be required against any additional load on the local transport network arising from airport growth.”*

The council's own consultants told us there is no mitigation to counter the huge impact on congestion, air pollution and climate of the level of airport expansion the council wants.

And, we would add, the destruction of a unique County Wildlife Site, rich with biodiversity.

2) NPPF (Feb 2019): Law on 'Determining applications' is contravened

47. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless **material considerations** indicate otherwise.

The application was advertised as a departure from the Local Plan. It breaches both National Planning Policy Framework, and statements and intentions in Luton's recent Local Plan, in many respects that demonstrate the application to be unsound.

3) The balance of harm has been ignored.

To say the scheme is "potentially" deliverable focuses on 'market opportunity'. This is not the function of local government. Its primary function should be as public servant to protect and provide for residents. It cannot ignore the wide array of adverse impacts that the scheme would cause.

Balance of harm

Airports National Policy Statement – June 2018

4.2.4 Para 4.4: "in considering any proposed development, in particular when weighing its adverse impacts against its benefits, the Examining Authority and the Secretary of State will take into account:

- Its potential benefits, including the facilitation of economic development (including job creation) and environmental improvement, and any long term or wider benefits; and
- Its potential adverse impacts (including any longer term and cumulative adverse impacts) as well as any measures to avoid, reduce or compensate for any adverse impacts."

In the view of over 400 objectors, and according to Local Plan and national policy, benefits of New Century Park, or airport expansion on the same site, are vastly outweighed by the environmental damage this application would cause.

Desirable factors

More jobs in future *but 70% not local (stakeholder workshop Feb2017) & record high employment.*

Note Lawrence Patterson (final para): there is no business case for offices at New Century Park

More future income for the council

New café, toilets, play area *but too near a major new road bringing noise, pollution and bad health*

Undesirable factors

Lack of democracy and trust in democratic leadership

Lack of sustainability and environmental thinking

Bad for UK economy – health of people in cars is affected more by air pollution than pedestrians and cyclists, costing billions in health care

Bad for UK economy – people flying abroad spend £billions more than UK visitors

Bad for UK economy – UK has great coasts & landscape but holiday destinations suffer

Bad for UK economy – false claim that for every million passengers, £118m to UK GDP

Need for this project not demonstrated – 'demand' is not need but 'market opportunity'

Loss of some jobs & inconvenience to existing companies – 15 office blocks demolished

No plans for how to deliver 'sustainable public transport' to new offices

No plans to show how it relates to 2 major related projects – airport expansion & housing in Herts

Unwise investment – new offices may be unoccupied as LLAL wants terminal 2 on same site

Unwise investment – urban Luton unsuitable for further expansion

Unwise investment – climate crisis makes Govt Aviation strategy / air expansion out of date

Unwise in 4th most congested town to create more traffic gridlock

Eaton Green Rd & other junctions would be over capacity, without including other nearby proposals

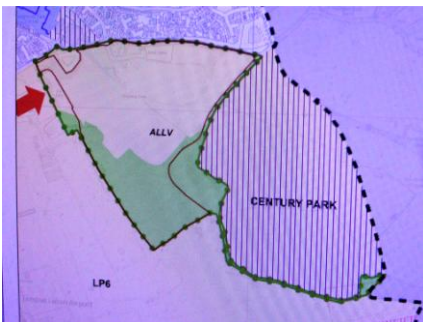
Congestion bad for economy, inconvenient, cuts leisure time, causes pollution, stress and ill-health

Increases instead of vital need to reduce polluting vehicles (eg diesels)
 Airport expansion and road-building make all these things worse
 Proposals to signalise roundabouts increase air pollution
 Noise impacts affect tranquility and health
 Vital need to protect, not destroy, all natural habitats and biodiversity especially CWS
 Loss of over 2 hectares of mature trees and hedgerows
 No mitigation possible for destruction of mature wildlife habitat and 2 hectares of trees
 Parks, green space and trees vital for exercise, health & wellbeing (Luton overdeveloped)
 Reversal of previous council work to provide nearby park for residents of nearby [housing](#)
 Most of 'replacement park' would be much further from homes
 Surface level parking a poor use of land and poor substitute for loss of rich CWS & DWS wildlife areas
 Loss of sports pitches
 Air quality from increased planes and vehicles has serious effects on health
 Air quality levels illegal at airport affecting workers
 Carbon emissions – wide range of measures needed to reduce these. Nothing yet
 Landfill – high risk of methane and other gases causing danger to people in any buildings
 Landfill – high risk of contamination of surface and groundwater
 Flood and drought risk (extreme weather is increasing)
 Archaeology – likely damage to historical artefacts and cultural heritage
 Parking in local roads – impact on residents
 Landscape and visual impact on Wigmore Area of Local Landscape Value for nearby residents
 Landscape and visual impact on surrounding area of Chilterns AONB countryside
 Climate change impact from planes on take-off / landing and on the upper atmosphere
 Climate change impact from vehicles
 Climate change impact on civilisation worldwide
 Mitigation is simply not possible against proposed levels of airport expansion

Luton Borough Council has ruined its reputation – it and LLAL have been profiting from ruining our children's future. It knows it can't be trusted, and must end its unpleasant culture of corporate greed, and work hard to become once more a transparent, responsible public servant which can be relied upon, not feared.

4) Ten ways Luton Council hid information from or misled the people it represents, throughout the period of this application, betraying public trust

1) Misrepresentation and Secret plans to destroy Wigmore Valley Park: The new Local Plan shows an arrow indicating a possible road across Wigmore Park. The fields beyond it, 'Century Park', had planning permission since 1997 for potential business use, but no access had previously been available.



Local Plan arrow indicates possible road, County Wildlife Site (green) and ALLV

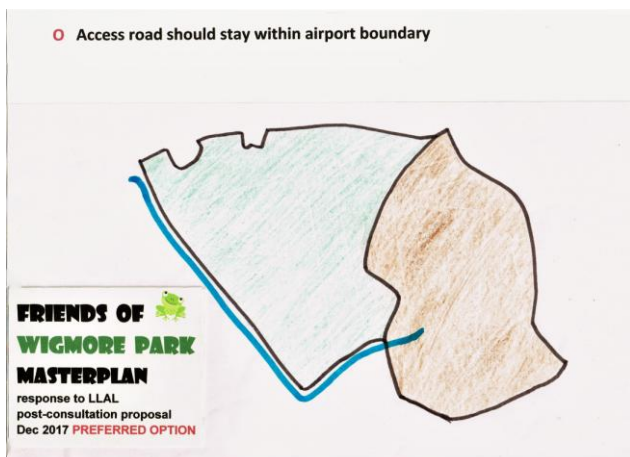
An article in the council newsletter *Lutononline*, 25 Sep 2016, referred to "a new road to serve Century Park, a key (potential) employment site on the eastern edge of the town." "LLAL is working up

proposals to replace any land required for the road by expanding and improving Wigmore Valley Park."

The invitation to 2 stakeholder workshops on 20/21 Feb 2017 said: "LLAL, working in partnership with its shareholder Luton Borough Council, has announced it is to submit a planning application in the summer for 70 acres of commercial development, facilitated by a new 1.6 mile access road."

This all appeared to be in line with the Local Plan. But people were shocked to hear at the workshops that Wigmore Valley Park, a similar size to the Century Park fields, had now been lumped together with the fields and rebranded 'New Century Park'. **This is a total departure from Local Plan policy, which only indicated a possible road across the park. It is a very serious betrayal of public trust.**

2) Secret 'sell-off': It was only later the public discovered that Wigmore Park had been 'licensed' secretly in 2015 (18 months earlier) by LBC to LLAL to 'work up proposals' to develop on the park. Freedom of Information request from Luton FoE to LBC: *What date did a LBC committee decide that Wigmore Valley Park was to be 'licensed' to LLAL, to plan a big development?* brought the response: *We do not hold this information. The licence to LLAL was granted under the Service Director for Property & Construction Services' delegated powers.* This is part of Luton BC, so it **does** hold the information. To have done this under 'delegated powers', usually used for an officer to deal with a house extension, is an insult to democracy. We were also told that 'The licence started in April 2017'. But the decision is recorded as having taken place 2 years earlier. No records of a meeting when this transaction took place are 'available'. LBC claims there was no legal requirement to inform the public, but this does not stand up to scrutiny. This park is owned by the public and managed on its behalf by the council, so **this action represents a very serious betrayal of public trust.** The council itself created and landscaped the park, planting thousands of trees, over landfill in the 1980s next to the Wigmore estate due to 'the need for recreation and exercise'. FoE suggests that it is quite feasible to use the 'public transport corridor' access shown in 2008 going around the airport perimeter to Century Park fields, which have planning permission for offices. We do not believe such development is needed, but it would avoid any intrusion on or damage to Wigmore Valley Park.



3) Eaton Green Road link u-turn: **The Local Plan contains a specific policy stating there would be no access from the airport or Century Park on to Eaton Green Road.** This is to protect residents from airport traffic. Luton council/LLAL went against this Plan Policy in autumn 2017, announcing a new road joining the dual carriageway through the airport to Eaton Green Road. It would destroy an attractive bank of trees forming a noise and pollution barrier between residents and the airport. **This action represents a very serious betrayal of public trust.**

4) The reason for 'New Century Park': Original plans showed more offices in Wigmore Park than in Century Park fields, and a dual carriageway emerging from the airport, continuing across the top of

Wigmore Park to Century Park fields. It was broken by 2 large roundabouts and spur roads led to several offices. Only a few offices were actually in Century Park fields, which had permission for them. We were told that these were some way off into the future, so clearly they were speculative.

The size of this road was obviously disproportionate to the offices it would serve.

There were two possible reasons for this, although members of the public could only see one when the application was presented. It was that 2100 new homes were planned across the border in Hertfordshire. This was a 'reserve' site in addition to the rest of Herts' housing allocation, so should have been a last resort. It would also go against planning guidance, coalescing the attractive villages of Cockernhoe and Mangrove Green, which some people visited to escape the overdevelopment of Luton. The proposed development by Bloor and Crown Estates was Luton-facing: there were no suitable roads between this housing and Hitchin, and only one access road into Luton, but Luton is the nearest place that could provide essential services.



Luton 'M25' proposed in 2008

Luton council had long wanted an 'M25' circular road around Luton, so some of the public guessed this road was the first part, to continue to the A505 near Lilley if Herts CC approved. A planning application has been submitted by Central Beds for an M1 - A6 link, which would gridlock the A6. However, **Luton would not admit their big road on the New Century Park diagram was anything to do with this housing or a continuation of the road into Hertfordshire.** **Another betrayal of public trust.**

5) New children's playground and café next to major road and big roundabout

The application proposed an 'improved' children's playground and café where children and adults would be playing or sitting next to a major road and **a big, noisy roundabout against the Local Plan.** Neither LLAL staff or their consultants seemed to realise this would not be a place of peace. It would subject people who can at present escape to a tranquil place to unacceptable levels of air pollution, which can stunt children's lung growth and seriously affect the health and wellbeing of older people. This is supposed to be an improvement on what is there already. **Another betrayal of public trust.**

6) Plan to double passenger numbers at the airport

It was in 2018, following the Govt's Aviation Strategy, that the public learned that Luton, having fast expanded the airport from 9 to 16 million passengers in 5 years, wanted to more than double this again, to 38m, despite the airport sitting over the town in a valley where pollution gathers. They had planned this since 2013 (see Gurtler), and now used the excuse of one line in the Govt strategy: "making the best use of existing runways". Their eyes glistened at the thought of all the money that could bring. It clouded their vision as to anything else that came under their role as public servant. **Another betrayal of public trust.**

7) London Luton Airport Ltd application for a road through the airport to New Century Park:

“Airport plans not connected – a different application”

The immediate outcry of people in Luton and those in a 15-mile radius who were already seriously affected by noise was ignored. In summer 2018 a ‘non-statutory consultation’ was held. It showed 4 options for a second airport terminal, 3 of which completely destroyed the people’s Wigmore Valley Park with its County Wildlife Site.

The questionnaire was blatantly biased, designed to get positive answers. There was no option for ‘NO expansion’ or ‘No expansion on to Wigmore Valley Park’; or for expanding modestly within the airport complex. No acknowledgement that their push for rapid expansion had made Luton the most unpopular airport, 4th most congested town and the fastest growing cause of climate change in the UK. No plan to reduce traffic – as this would be impossible – but no list of ways the environmental damage and inconvenience could even be mitigated. No acknowledgement that more flights means more pollution - every million passengers brings a million more vehicles on to the roads. We were told in Feb 2017 that only 19% of airport passengers come by train, and the Local Plan inspector warned the council not to assume the Dart link would substantially increase this. In any case further expansion would overwhelm any benefits.

The map for the Terminal 2 ‘preferred option’ can be overlaid on to the New Century Park proposals. The two proposals are both hugely damaging, and in conflict with each other. Both cannot be built.

If an outside body were to propose such a major application, LBC would make many planning gain demands through section 106. But it may not be so demanding of itself. Being an outline application, LBC/LLAL could totally change the plans after approval.

Wigmore Park would be covered in long-stay airport car parks. A diagram for the longer-term intention shows Century Park fields also covered in airport car parks. The business park is for airport-related businesses.

An obvious reason for the separate application is to avoid the proper scrutiny of a Development Control Order (DCO) rather than an EIA. **Another betrayal of public trust.**

8) Air pollution cover-up at airport part of New Century Park application *(see main section 9 below)*

All children and adults have a right to breathe clean air. But there is a public health emergency across the UK caused by illegally polluted air. It is dangerously over the legal limit in many parts of Luton, as recorded by Defra (attachment) and Luton FoE (Section 9 below). Luton BC has measured NO₂ at some sites, but not the bigger killer, diesel particulates. It has not told the public, and not acted to reduce emissions. Luton’s Joint Strategic Needs Assessment 2015 shows high rates of respiratory problems, especially in the young.

Luton’s 2017 Air Quality Annual Status Report [REDACTED] uses figures from 2016 or earlier but shows some monitoring sites recording consistently illegal air quality. Many busy sites in the borough are not monitored. LBC has failed in its legal duty to take appropriate measures, declare Air Quality Management Areas (AQMAS) around dangerous sites such as the airport, and introduce measures to reduce pollution.

NO₂ readings from on & around airport terminal *(from a LLAL report forming part of this application):*

At least six busy airport sites record consistently illegal air quality.

LA01d, LA02d (Airport approach road), LA05 (runway apron), LA06 (President Way junction), LA14D (Stand 61), LA16D (Setdown area) – all readings consistently illegal.

LN23 Eaton Green Rd – close to legal maximum (this accords with Luton FoE measurements, Section 9 below)

LLAL took an average of readings from 20 or more NO₂ monitoring points in and around the airport, of which 6 at the busiest places are consistently above legal limits, and claimed there is no legal breach. This is unacceptable. Any point that is illegal remains illegal. **People are not exposed to less air pollution at the 6 busiest places on the airport because pollution is also monitored at 14 less busy places.** NO₂ is a toxic gas which inflames the lining of the lungs, and can lead to lifelong problems. The legal annual limit for NO₂ is 40 micrograms per cubic metre (ug/m³). Defra / WHO: There are **no safe levels** of exposure to air pollution. *

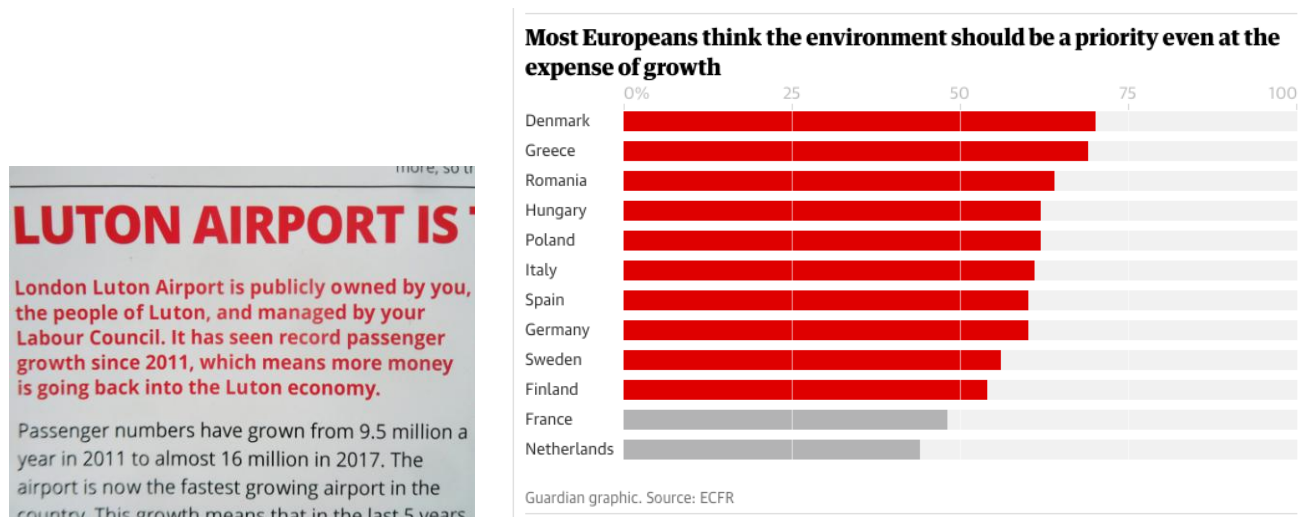
We attach comments by Carolyn Cottier to N Herts Inquiry, concerning air pollution at Luton airport and the east of Luton. While we cannot vouch for all her claims, her evidence appears to show serious transgressions of legal responsibility for public health by Luton Council.

This shows that for LBC and LLAL, business as usual in pursuit of money overrides the need to take action to protect the health of workers who contribute to airport income, and the health of nearby residents. Under the Environment Act 1995, local authorities must review air quality. If they find that air quality objectives in a particular area are not expected to be met, they must designate it as an **Air Quality Management Area**, and develop an **Air Quality Action Plan**. The airport and residential roads around it qualify immediately to be made an AQMA, at which measures must be taken to reduce pollution. The council is trying to avoid this. **Another betrayal of public trust.**

* DEFRA Air Quality Briefing for Public Health Directors Mar 2017: "International Agency for Research on Cancer listed diesel exhaust pollution as a Class 1 carcinogen. In 2013, the World Health Organization (WHO) published a review of 2,200 studies concluding that: • Annual PM2.5 concentrations are associated with all-cause mortality to a high level of confidence • **"There is no evidence of a safe level of exposure to PM or a threshold below which no adverse health effects occur"**. Negative health impacts have been found well below current EU & UK limits.

Also: Air pollution Deaths – Watford & Luton worst in East of England 2013 – 6.5 per 1000 Air Pollution.

Government estimates air pollution to reduce life expectancy of everyone in the UK by an average of 7-8 months. This is worse in highly polluted areas with regular exposure. Each car in London costs NHS & Society £8000 due to pollution.



UK way behind Europe in recognising we can't keep 'growing' (eg airport expansion) on a finite planet

9) The public owns Luton airport. This has been stated on Labour leaflets, and by the Council Leader in public on 8 Oct 2018. It has grown rapidly, unsustainably, decades faster than predicted, without environmental controls. **People don't want congestion, noise, pollution or bad health, which an airport with double the passengers would bring them, and they need their park.** No one asked Luton Council, or gave permission, for LBC to give away the people's park to LLAL to develop. There should have been a major consultation before any such decision was taken.

Another betrayal of public trust.

10) Misleading questionnaires

At a presentation in Wigmore, LBC/LLAL lied about high support for airport expansion: In consultations for both the dual carriageway/New Century Park and major airport expansion ('Future Luton' – implying impact on the whole town) questionnaires were used in which the questions were blatantly biased, designed to give positive answers. (More detail can be supplied.)

This is not in accordance with required procedures, including the “**Gunning Principles**” (a consultation must be carried out properly and with an open mind with due consideration to the responses).

The Council has a moral & legal Duty of Care to act on behalf of and protect residents. Its proposed development on a valuable Community Asset does not comply with key relevant Local Plan policies. It has acted undemocratically and in bad faith, and should be obliged to withdraw its application, or have it overturned.

5) The plan fails to take into account advice in both its own plan and national guidance on considering development proposals *Also see Section 12 below*

NPPF (Feb 2019): Considering development proposals

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

The underlined section is an exact description of the result of building a dual carriageway through the airport and the New Century Park development on Wigmore Park, the new road funnelling traffic on to Eaton Green Road and residential roads, against Local Plan policy.

Air pollution: Children breathe toxic air at school & on school run

Further, the capacity of the recently expanded M1 Junction 10 and 10A is already a problem – traffic to the airport now backs up the motorway in the early morning, and any further development such as the proposed major dual carriageway through the airport, large offices, more airport car parks and a hotel on Wigmore Valley Park would make this situation worse. This is not only bad for the strategy of Highways England, but for the health of local residents caught in jams and a pollution corridor.

Hertfordshire Local Transport Plan (2018-2031) May 2018

Draft Policy 11 – Airports, states: “*The county council, working in partnership with neighbouring local authorities and airport operators, will seek improvements to surface access to Luton and Stansted Airports, and promote and where possible facilitate a modal shift of both airport passengers and employees towards sustainable modes of transport.*

The county council is opposed to new runway development at Luton and Stansted Airports.”

In its document **Future Luton**, (28 Mar 2019) the applicant LLAL states:

3.4.39 *Local and strategic traffic models are currently under development and traffic modelling, based on passenger forecasts is underway.*

Traffic modelling of the impact of the proposed dual carriageway through the airport and a new road

feeding traffic on to Eaton Green Road, against Local Plan policy, on local roads and the wider network, should have been complete before submitting the EIA application for New Century Park, especially as the dual carriageway is likely to lead to new housing in Hertfordshire.

The inadequacy of traffic assessment was severely criticised by Senior Planning officer David Gurtler in an internal report in May 2018 (*attachment*).

Also see comments below on **Local Plan Policy LLP6**.

Under 'The Principle of Development' in Gurtler's agenda summary, para 193, he concludes:

"The issue of traffic and the link road was addressed in the officer's report in a number of areas (and in the planning application with a Transport Assessment, a Supplementary Transport Assessment and in the Environmental Statement) and was considered by both the Highway Authority and Highways England – both of whom ultimately agreed that subject to conditions the development was acceptable. You will see from the Committee report that the conditions requested by Highways England and the Highway Authority place certain timing restrictions on the delivery of the link to Eaton Green Road and also the provision of the New Century Park access road."

This is surprising, as he could not have been more critical in the attached internal document about the inadequacy of the Transport Assessment, which did NOT take into account the effect of this development on either local roads or the wider network. A vital omission is that other major developments are proposed, including housing in Herts, and Terminal 2, allowing further airport expansion, but the assessments have deliberately been confined to New Century Park.

Timing is irrelevant: as soon as traffic is released on to Eaton Green Road, it is at capacity and would cause rat runs and widespread congestion greater than has already been caused by rapid airport expansion. It seems that Luton BC care nothing for the inconvenience, health and welfare of constituents, only for their major road to 'unlock' further development at any cost. Highways England is more concerned about impact on major roads, and we have heard concerns from them about peak hour tailbacks to the M1.

Table 3-1: *Potential Indicative Off-site Highway Interventions in the Proposed Development* lists a series of proposed alterations to junctions. No strategy is offered for reducing traffic levels to reduce congestion, pollution, or climate emissions. Indeed, signalling some junctions is likely to increase pollution and the effects on health of both local residents, including pupils walking daily to school, and those driving in pollution corridors.

The Transport Assessment is completely inadequate and does not provide a plan for East of Luton as requested 4 times by David Wynn, who gave evidence on 27 March.

p101 295 of the Dev Control Agenda assumes all traffic growth everything can be mitigated. It CAN'T. p113 356 is grossly complacent, and NOT what Gurtler said in his internal report.

pp116-131 This is nowhere near the detail needed for a full application. There is no evidence that it could meet all these policy objectives. It is somewhat farcical, as office development is not the aim, but Terminal 2. **Road impacts would be disastrous.**

p117 The list of developments does not justify the expense of a dual carriageway through the airport, putting people out of business, or costly high-risk work to try to make the landfill safe to people in new offices, to prevent irreversible contamination of groundwater over a 15-mile area, or offices or future terminal where methane builds up and explodes or makes people ill.

p119 Air quality – see sections 4 and 12

The council should build offices on brownfield sites first – there are several sites in the borough.

6) The plan fails to take into account advice in both its own plan and national guidance on conserving and enhancing biodiversity and the natural environment

NPPF (Feb 2019): 15. Conserving and enhancing the natural environment

20. **Strategic policies** should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision¹² for:

- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation / adaptation.

170. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land.

Habitats and biodiversity

174. To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

175. When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists

177. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Hedgerows

17.2.6 The Hedgerows Regulations 1997³²¹ are designed to protect 'Important' countryside hedgerows from removal. To qualify as 'Important', a hedgerow must be at least 30 years old and

meet certain qualifying criteria, which identify hedgerows of particular archaeological, historical, wildlife and landscape value.

17.2.7 *It is an offence to remove an 'Important' hedgerow without planning consent or a hedgerow removal notice.*

The bridleway that runs along the east side of Wigmore Valley Park and past the airport fire practice area passes along a strip of ancient woodland and an ancient hedgerow of great character.

Badgers

17.2.8 *Badgers (*Meles meles*) are afforded protection through the provisions of the Protection of Badgers Act 1992, which is based primarily on the need to protect badgers from baiting and deliberate harm or injury. As such, without a licence from Natural England, it is an offence to:*

- *wilfully kill, injure, take, possess or cruelly ill-treat a badger;*
- *damage or interfere with a sett; or*
- *disturb a badger whilst it is occupying a sett.*

There is currently more than one sett on Wigmore/Century Park.

Reptiles and amphibians

17.2.17 *Slow worms, frogs and newts are present on the site, and subject to protection through the provisions of the Wildlife and Countryside Act 1981 (as amended) and the CROW Act 2000. This legislation makes it illegal to intentionally kill or injure an amphibian or reptile.*

Other species recently recorded at Wigmore Park

462 species have been recorded at Wigmore Park in recent years, 380 on the County Wildlife Site. These include: Sanicle (England Red List plant, local rarity, IUCN, 2016); 5 species of orchid (CITES - thousands of individuals (an attractive booklet has been produced: *The Wild Orchids of Wigmore Park* by Richard & Geraldine Hogg); Bluebells in a fragment of ancient woodland; Grizzled skipper (2017) and Chalkhill Blue (2010) butterflies; at least 74 bird species include Linnet, Grey wagtail, yellowhammer (Beds Red List & Birds of Conservation Concern), and skylark (2017, NERC, Species of Principal Importance). The Wildlife Trust replied robustly on 3 Apr 2017 to the Scoping Request, which *"gives the impression that there will be no impact on biodiversity, and does not mention that the CWS would be destroyed"*: *This site has been recognised for its neutral and calcareous grassland and hedgerows, all of which are habitats of 'principal importance' under Section 41 of the Natural Environment and Rural Communities Act, 2006 and have local Biodiversity Action Plans. The importance of the CWS is recognised in Policy LP28: Biodiversity and Nature Conservation of the Pre-Submission Luton Local Plan 2011-2031.* They requested: *Clear assessment of the impact of the development on biodiversity and any mitigation measures necessary; and Clear assessment of the net gain for biodiversity and enhancement of ecological networks provided by the development in line with the National Planning Policy Framework.*

We are certain that this request has not been fully complied with and no net gain would be achieved.

Trees

Please note FoE's objections to the proposed removal of over 2 hectares of mature trees from Wigmore Park, planted by a previous generation of conscientious council officers.

Also comments from Lawrence Patterson (*attachment*).

Local Plan policies

Point 10.9 *"Mature Trees provide valuable eco-system services & environmental benefits including carbon reduction, filtering noise, cooling, wildlife corridors and havens which harbour many diverse plant and animal species that need protection."*

"Strategic Objective 5: *To improve the built and natural environment, taking into account the landscape, setting and character of the town and neighbourhoods within its national AONB and local landscape settings."* Offices, hotel, extensive car parks or a new terminal would seriously affect the Chilterns Area of Outstanding Natural Beauty (AONB).

“Strategic Objective 10: Improve, protect and enhance biodiversity of natural areas within the town, including the quality, accessibility, health and recreational value of green space, Areas of Local Landscape Value (ALLV) and their connectivity.”

Key issue: “Population growth will increase demand placed on Luton’s deficient supply of green space and wildlife habitats, and on valued landscapes. Development will need to protect or increase the limited supply of recreational green space and green infrastructure networks within the borough.”
NOT IN HERTFORDSHIRE, where you propose to move the park.

Central Bedfordshire Council South Bedfordshire Local Plan 2004-2011 borders the site and has policies NE3 *Control of Development in the Areas of Great Landscape Value*, NE6 *Protection of Features of Nature Conservation Value*, and BE1 *Control of Development affecting Scheduled Ancient Monuments and Areas of Archaeological Importance*.

7) The plan fails to take into account advice in both its own plan and national guidance on promoting healthy and safe communities

NPPF (Feb 2019): 8. Promoting healthy and safe communities

91. *Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities*

92. *To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;*
- c) guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs.*

Many of the above needs are provided by Wigmore Valley Park, nearby to homes but providing natural surroundings. The New Century Park application would destroy the park, removing these.

Open space and recreation

96. *Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.*

97. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

98. *Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.*

The application is against Green Space Policy – it proposes loss of essential public park near homes.

The current licence to LLAL requires the land to be used as **Public Open Space**. “Any replacement park must be an improvement on the present park.” This must be not only in terms of size but quality including the value of a County Wildlife Site, which has taken 35 years to evolve. It can’t be compared with a children’s play area and farmer’s fields, which are **not** an improvement as the new park is much further from homes. ‘Improving’ a green space site elsewhere in the borough is irrelevant. To propose a vast increase in surface level airport car parking on a public park/CWS is unacceptable.

Greenspace near home in childhood is linked to fewer adult respiratory problems

██

Air pollution: Children breathe toxic air at school & on school run

██

Luton is highly over-developed and painfully short of green space, so Wigmore Valley Park, an important District Park, is NOT surplus to requirements. The ‘replacement park’ for Wigmore Valley Park would be worse in every respect: the quality would be poorer in that WVP is large, semi-wild, unusual in being close to a built-up area. It is an Area of Local Landscape Value, with attractive views across a valley. Thanks to a very interesting mosaic of habitat, the designated County Wildlife Site provides and protects a rich diversity of wildlife including thousands of orchids, over 60 species of birds, a strip of ancient woodland with bluebells, which connects adults and children with nature. It was landscaped and planted with thousands of trees by a previous council, who recognised the need for fresh air and exercise, and for a large proportion of the Wigmore estate, it is on the doorstep.

The proposed replacement park is much further away and less convenient for people with busy lives or who are unable to walk that far. It provides a vital buffer against air pollution and noise from the airport. ‘Quantity’ is irrelevant – a slightly larger park, further away, on farmers’ fields with no wildlife, is NOT an equivalent or better provision. The buffer would be lost if the New Century Park development were to go ahead, as 2 hectares of mature trees planted by the council would be destroyed, and it would bring a major road, large offices, a 5-storey hotel and airport car parks close to homes. Luton Council should be seeking to improve quality of life for residents.

Along the strip of ancient woodland on the east side of Wigmore Valley Park is an attractive bridleway that forms part of an existing rights of way network.

Building a major road near a children’s play area and café & felling 2 hectares of trees which absorb pollution is a serious health risk, going against providing a healthy, safe community. If the airport expansion proposal was taken forward, the play area and café would be close to the major approach road to Terminal 2 and airport parking areas.

Yet **Local Plan Policy LLP6** says:

Wigmore Valley Park E. *Wigmore Valley Park is integral to the London Luton Airport Strategic Allocation. In delivering development and access under clause D (i.e. Century Park) above, including any reconfiguration of the land uses that may be necessary, the following criteria will need to be satisfied:*

- *provision will be made to ensure that the scale and quality of open space and landscaping in the area is maintained, and if feasible, ensure that there is a net increase in open space provision;*
 - *bio-diversity will be enhanced and improved within the Borough;*
 - *that new open space to replace Wigmore Valley Park offers facilities of at least equal quality and is available and accessible before any development takes place on the existing Wigmore Valley Park.*
- The major problem is that is not just ‘Open Space’, it includes a vital habitat, a County Wildlife Site; the ‘new open space’ has no trees, would not be biodiverse for 30 years; is a long way from homes.

8) The plan fails to take into account advice in both its own plan and national guidance on making effective use of land

NPPF (Feb 2019): 11. Making effective use of land

117. Planning policies and decisions should promote an effective use of land. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.

The whole of Wigmore Park is green land, and most of it, including the whole County Wildlife Site, would be lost with this development.

c) support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

This has already been achieved. The best option for a landfill site was chosen 35-40 years ago by Luton Council, who created Wigmore Valley Park above it. Driving deep pilings into the landfill for development brings a high risk, as advised by consultants, of releasing methane and other toxic gases into buildings above it, and contaminating the groundwater below over a wide catchment.

Robin Porter, LLAL CEO, on 3C Radio 7 Jan 2019 said: *"The new park would give better access, as the current site becomes a bog in Winter"*. This is why its an important wildlife site. So how can you build on such a soggy site? This was the largest landfill in Luton and contains many toxins. It is highly unlikely you could drain it safely. If you put hundreds of pilings into landfill, water will leak in, carrying contamination from the landfill irreversibly into groundwater. There is a huge catchment area - where would the water end up? The Environment Agency may regret that they said this could go ahead with a number of constraints to manage pollution.

Further comments on landfill - See FoE responses

Local Plan Policy LLP6 – London Luton Airport Strategic Allocation

This is a key policy which is contrary to the New Century Park application:

*Details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that **no use is made of Eaton Green Road to provide access to Century Park or the Airport**, except for public transport, cyclists, pedestrians and in case of emergency.*

Airport Expansion B. *Proposals for expansion of the airport and its operation, together with any associated surface access improvements, will be assessed against the Local Plan policies as a whole taking account of the wider sub-regional impact of the airport...*

Airport-related Car Parking C. *Proposals for airport related car parking should be located within the Airport Strategic Allocation, as shown on the proposals plan (excluding Century Park and Wigmore Valley Park) and will need to demonstrate that the proposals: meet an objectively assessed need; do not adversely affect the adjoining highway network; and will not lead to detriment to the amenity of the area and neighbouring occupiers...*

This seems to suggest that there should be NO airport car parking on Wigmore Valley Park or Century Park (fields). If so, the application, which includes long-stay surface airport car parking on Wigmore

Park, is **against Local Plan policy in a further way.**

It is the view of most of the 400 or more people who sent in written objections that the adjoining highway network would be adversely affected, and would lead to detriment to the amenity of the area in terms of greater congestion, danger and pollution, affecting health.

Century Park D. *Luton-based businesses, new business start-ups as well as significant inward investments will be allowed provided that it does not generate bad neighbour issues.*

As these 4-storey offices, a major roundabout and new road into Eaton Green Road bringing related traffic, noise and pollution in some cases 200m from homes, and much closer to a café and children's playground, it is very hard to see how this would not 'generate bad neighbour issues'.

In its document **Future Luton**, (28 Mar 2019) the applicant LLAL states:

3.4.25 There are two areas south west of LTN, along New Airport Way near Luton Airport Parkway railway station, currently under consideration for use as mid stay and/or employee parking, and car hire and return. If developed as part of this project, these facilities are likely to be multi-storey.

If these sites are viable for further parking, there is no need, as we have argued consistently, to build any surface level airport car parks on Wigmore Valley Park for the New Century Park application. A large part, or all of the park, can therefore be saved.

9) The plan fails to take into account advice in both its own plan and national guidance on Air pollution, and in view of recent knowledge, to act, on serious health grounds (see also section 4, part 8)

The extra pollution caused by this development would breach the EU Air Quality regulations. Air Quality rules are already being breached **by emissions from aircraft.**

No account is being taken of Ultra Fine Particles. (A Defra report refers to 3 studies.)

See objection 245, p215-16 on Significant traffic growth and premature Luton deaths from pollution.

Knowledge of the causes and effects of air pollution has increased exponentially during the period leading up to this application being decided. This has not been taken into account and makes the application unsafe.

At the meeting on 27 Mar when this application was provisionally passed, with 2 weeks of the consultation period left, councillors showed ignorance of, or disdain for, the likely impact on the NHS, which has a growing inability to provide care, and is at risk of not being able to look after future generations.

NO₂ is a toxic gas which inflames the lining of the lungs, and can lead to lifelong problems. The legal annual limit for NO₂ is 40 micrograms per cubic metre (ug/m³) but the WHO states that there are no safe levels of exposure to air pollution.

LLAL figures supplied with the application show that at least 6 monitoring sites at the busiest places on or around the airport terminal show NO₂ readings consistently breaching legal limits. This requires an immediate declaration of an Air Quality Management Area at and around the airport. Instead, LutonBC/LLAL averaged out figures across 20 or more monitoring sites, claiming there is no problem.

This demonstrates that for LBC and LLAL, to continue business as usual in pursuit of money overrides the need to take action to protect the health of the workers who contribute to airport income, and to protect the health of nearby residents.

Luton FoE took readings mainly in east Luton, to measure the concentration of NO₂ in the air, using diffusion tubes, which were each positioned for 1 month at several junctions in east Luton. Defra advice was followed, the tubes being placed out of reach, about 3 metres high. This is a scientifically valid process co-ordinated by Friends of the Earth nationally and verified by the Gradko laboratory to which they were sent. Figures are projected to the annual legal limit, and rounded down to 0.89 to allow for bias.

The period was Mar-Apr 2018, during which there was less traffic due to school holidays, and less pollution due to a week of rain, so air pollution would have been higher for much of the year. As a control, we took a reading in Bramingham Wood, which was 8.23 µg/m³. The legal mean annual limit for nitrogen dioxide (NO₂) is 40µg/m³. After rounding down, results at junctions were:

ILLEGAL LEVELS

44.6 µg/m³ Junction of flyover and Church Street at Crawley Green Rd roundabout

44.28 µg/m³ Junction of Vauxhall Way / Crawley Green Rd roundabout

DANGEROUSLY HIGH

37.57 µg/m³ (42.21 before rounding down) Junction of Eaton Green Rd / Frank Lester Way

34.1 µg/m³ Asda roundabout / Wigmore Lane junction

31.73 µg/m³ Eaton Green Rd / Lalleford Rd junction

31.62 µg/m³ Stopsley Way / Hitchin Rd (Jansel House roundabout)

30.49 µg/m³ Ashcroft Rd / Crawley Green Rd junction (nr Ashcroft School)

A Defra site on the A505 near M1 J11 constant monitors NO₂. Figures are taken over 24 hrs, and averaged, which enables figures to be under the legal limit. This includes times when most people are at home and in bed. The true figures should reflect when people are most exposed to pollution during the working day. This monitoring station frequently shows levels **two, three or even four times the legal maximum**, particularly in early morning peak hours (*sample readings attached*).

Luton Council has responsibility for Health, and cannot continue to ignore the serious impacts of increased traffic it is causing through airport expansion, pollution from planes, and development. A505 Defra monitoring includes pollution from people coming to the airport from Dunstable and the west, from A5 north and south, M1 J11, and added traffic from the new 2.8 mile dual carriageway A5-M1 Link (Dunstable Northern Bypass).

There is a threat of a future continuation east of the M1 to the A6, which would bring more traffic, noise and pollution, and gridlock the already busy A6. This is the subject of a current application by Central Beds, and **must not be allowed**.

Local Plan Policy LLP6 London Luton Airport Strategic Allocation states that proposals for development will only be supported where the following criteria are met: *"iv. they fully assess the impacts of any increase in Air Transport Movements on surrounding occupiers and/or local environment (in terms of noise, disturbance, air quality and climate change impacts), and identify appropriate forms of mitigation in the event significant adverse effects are identified."*

LBC/LLAL have already proved themselves entirely unable to meet this task. Car use and traffic in Luton is far above the national average. The airport has expanded far faster than they expected, and Luton is 4th most congested town. All the above impacts apply. None of these have been mitigated.

Findings about the effects of air pollution on health (*all published 2018-19*)

Air Quality analysis: Harm being done has been deliberately concealed. Health concerns: Queen Mary's Hospital confirms that Ultra Fine Particles penetrate deep into the respiratory system with potential translocation to the bloodstream. Inhaled pollution particles move to the placenta.



Public Health England guidance on health matters: air pollution (14 Nov 2018)

From miscarriage to teenage psychosis: air pollution health effects much worse than previously believed - causes at least 40,000 early deaths in UK from lung & heart disease, & linked to many health impacts

Air Pollution causes 15,000 new diabetes cases a year in UK

Air pollution dementia threat

Air pollution causes huge loss of intelligence

Air pollution particles in mothers' placentas harms unborn babies

Air pollution: Greenspace nr home in childhood linked to fewer adult respiratory problems

Air pollution: Children breathe toxic air at school & on school run

Air pollution linked to changes in heart structure

Tiny air pollutants inflame airways and harm heart

Cleaner air from tackling climate change 'would save millions of lives'

Air Pollution: Govt's Chief Medical Officer calls for tougher standards

10% of London hospital treatment for children was linked with Air pollution
- 1,000 asthmatic children need hospital treatment thanks to London's toxic air

Air pollution in Luton hits illegal levels *published in Luton Herald 21 June 2018 (attached)*

On Luton air pollution

10) The plan fails to take into account advice in both its own plan and national guidance on Climate change, and national momentum on need to act on climate

The fastest growing cause of climate change is FLYING.

Luton is the fastest growing UK airport.

Luton is the fastest growing UK cause of Climate Change.

This application is a major step toward expanding the airport.

Knowledge of the causes and effects of air pollution has increased exponentially during the period leading up to this application being decided. This has not been taken into account and makes the application unsafe.

Luton Borough Council Climate Change Adaptation Action Plan Is woefully inadequate. It is full of information tables, but no action. It is astonishing that as Luton airport is the fastest growing source of climate emissions, the plan does nothing to **reduce** climate emissions.

No explanation provided as to how climate change emissions (not only CO₂) would be taken into account. Paris Agreement should be in Sustainability Appraisal.

NPPF: 14. Planning for climate change (Guidance Feb 2019)

149. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

The East of England is the driest region in the UK. Large developments like New Century Park and associated airport expansion would place great stress on the ability of water companies to cope with supply. A designated Biodiversity area and green corridor would be destroyed, and landscapes adversely affected, against the wishes of bodies such as The Chiltern Conservation Board and CPRE.

Since the IPCC report in Oct 2018, based on 6000 scientific studies, there has been a step change in the realisation of our predicament, demonstrated by climate strikes across the world.

We have 12 years to limit climate change catastrophe.

Local, national and international responsibilities cannot be separated.

"The planet would reach the crucial 1.5C warming as early as 2030 under current greenhouse gas emission levels: risking wildfires, extreme droughts, floods, and serious famine" - UN Intergovernmental Panel on Climate Change (IPCC), 8 Oct 2018

"We only have the slimmest of opportunities remaining to avoid unthinkable damage to the climate system that supports life as we know it." - IPCC board member Amjad Abdulla

"We must get serious about decarbonising and meeting our climate change targets" - John McDonnell, Deputy Labour leader, talking about IPCC report and Heathrow expansion

Greta Thunberg (Nobel prize nominee): “When I’m 75 in 2078 perhaps my children will ask why you didn’t do anything when there was still time. What we do or don’t do now will affect my entire life and the lives of my children and grandchildren.”

David Attenborough says we must work very hard & fast to keep below 1.5C warming to prevent catastrophic climate change and the collapse of human civilisation. Government Report 2018: “Without significant emission reductions we may reach 5°C by the end of the century, beyond the point of extreme danger. Beyond 2°C climate change becomes irreversible and catastrophic. Food prices, large scale migration, human rights, state failure, grave threats to international security.”

This renders the Government’s Aviation strategy, and Luton’s plans for airport expansion and related activities, hopelessly out of date.

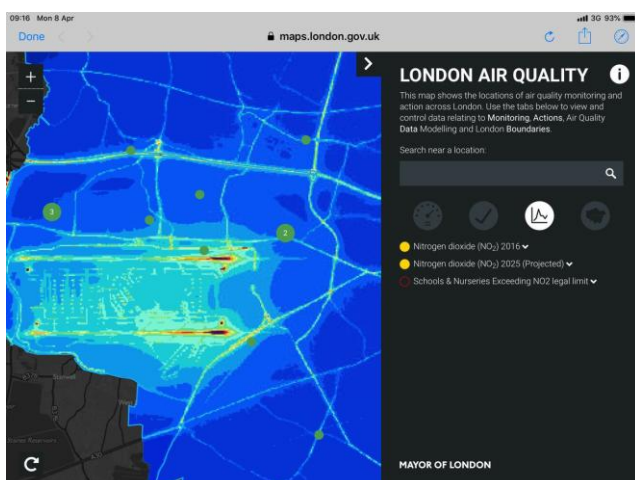
This is a pivotal point in human history. We cannot pretend we were asleep and this was a bad dream. Business as usual must stop. There is no choice. Economic activity must refocus. The IPCC has announced something much worse than the bankers’ crash.

Fresh Water from the Arctic is pouring into the Atlantic, slowing the Gulf Stream.

Long hot periods, like those of summer 2018, will become more severe and common, increasing heat-related deaths and causing more forest fires

The greatest change will be to nature, which we rely on to survive. Insects, vital for pollination of crops & plants, will lose half their habitat. We must **SAVE WIGMORE VALLEY PARK**.

We have a deadline. Luton is very lucky to have substantial airport income – it doesn’t need to be greedy. Luton BC’s primary job is not property development, but to look after the health and well-being not only its residents but those beyond its borders, who travel to the town or feel the impacts of the council’s activities. Ten years ago LBC employed 5 officers in a climate dept, whose responsibilities included educating people on how to change behaviour to reduce their carbon footprint, the council examining its own footprint to set an example. Now there are no climate officers. Have the dangers of climate change gone away? No, they have got worse.



It is not cars driving up the Heathrow runways that are causing this pollution

All decisions about airport income must be based on CLIMATE SUSTAINABILITY, or they must be abandoned. Otherwise in 12 years today’s children like those who marched to Luton Town Hall on 15 March will ask: “What did you do to reduce the great warming?” We hope they won’t have to say:

“Why did you go ahead with this, knowing its fatal consequences?” We hope you won’t have to say: “We prioritised economic growth over people’s health and wellbeing.”

People in the UK fly more than any other country.

Luton Airport’s rapid growth has made it the UK’s fastest growing source of climate change.

A lot of public money has been spent on consultants. But they said “You cannot mitigate for the degree of air pollution & warming from this level of expansion and the millions of journeys it produces.” They also said that almost every aspect of digging up or building on the landfill site beneath Wigmore Park is high risk and costly. We must not throw good money after bad.

No new major roads can be built. They spark millions of vehicle journeys, and are a major contributor to climate change and air pollution. **This includes the one through the airport.**

Any public money spent on infrastructure for airport expansion would be wasted.

- 1) No one would occupy offices on a site where Terminal 2 is due to be developed.
- 2) Pressure will increase to meet air pollution, fossil fuel reduction and climate targets, and the project will have to be halted.
- 3) The world situation is such that airports will quickly stop expanding.
- 4) Without expansion, airport-related businesses can be accommodated on existing airport land.
- 5) At the end of the 2004 Milton Keynes & S Midlands Sub-Regional Strategy Public Inquiry, the three-person panel wisely told Luton “not to put all its eggs into the airport basket.”

One transatlantic flight uses up one person’s annual share of carbon emissions, and major changes must take place urgently to cut climate gases.

The fastest growing source of these, flying, which is doing great damage in our thin upper atmosphere, cannot continue to grow – indeed, short-haul flights must stop as there are far more benign alternatives (Holland is already banning short-haul flights, eg from Amsterdam to London). Flying must from now on be treated mainly as for essential journeys or occasional visits to families abroad, and ‘frequent flyer’ taxes are needed to act as a deterrent – it has at last been realised that everyone else should not be subsidising frequent flyers, and Caroline Lucas MP on Any Questions received a huge round of applause when she said that.

Damage to the earth, causing noise, pollution and suffering to people is **a breach of human rights**.

The New Century Park application cannot be separated from airport expansion plans. It includes a dual carriageway through the airport, extensive airport car parks, and is on the same land. And it involves Luton Council giving itself permission to go ahead. Locally this is out of control and must be decided by planning experts at a higher level.

11) LLAL’s publication (28 March 2019) *Future Luton: making best use of our runway - statements and intentions must be taken into account* (attachments 6 and 7)

Note: publication is one day after councillors ‘passed’ the New Century Park application for development on the same land, despite it being 2 years since the development was introduced to the public, and 2 weeks remaining of public consultation.

This approval is provisional – powers were delegated to a senior planning officer to receive until the expiry date of 10 April and ‘process’ any further submissions which raised Material Considerations.

Most of the measurements and findings in this document apply also to the New Century Park project, and the two proposed developments occupy the same area of land. So New Century Park cannot be just an EIA application, but a Development Consent Order application. (*see Planning rules in the objection by Carolyn Cottier*). The major road, a 1.6 mile dual carriageway through the airport, marks the first stage of proposed major airport expansion, so the application must be thoroughly scrutinised as a NISP by the Planning Inspectorate on behalf of government.

‘Both of these documents have been driven by forecasts of rising demand in air travel, the need for an integrated approach to the sector, and the impending departure of the UK from the European Union.’
(p24) Demand is something that is created by marketing, not a requirement you have to meet.

Capacity permission at Luton is 18 million passengers, which was supposed to be many years away, but has been reached much too fast, making Luton the fastest growing source of climate change in the UK. This capacity must not be exceeded. To ‘make the best use of existing runways’ is **not** instructing operators to increase capacity to unsustainable levels.

The full statement, quoted on LLAL’s p23, is: *“The government is supportive of airports beyond Heathrow making best use of their existing runways. However, we recognise that the development of airports can have negative as well as positive local impacts, including on noise levels. We therefore consider that any proposals should be judged by the relevant planning authority, taking careful account of all relevant considerations, particularly economic and environmental impacts and proposed mitigations.”* (para 1.29)

‘Making best use of their existing runways’ must now be interpreted as making airports, and vehicles accessing them, far more energy-efficient and less polluting, to cut fuel-wasting stacking in the sky, and to radically reduce the fossil emissions produced. Higher charges should be introduced for diesel vehicles, and car sharing/pooling and public transport strongly incentivised. Economic growth must be quickly switched to renewable energy and far more local production of food and goods. All this applies whether or not the UK leaves the EU.

Luton has severe constraints which render it impossible to expand further: the airport is on a hill above the town which sits in a valley that traps pollution. Too-rapid expansion has made Luton 4th most congested town, in which people cannot get to work without sitting in pollution corridors, breathing in NO2 and PM2.5, affecting their long-term health.

Environment Act 1995 (p78 of LLAL report)

6.2.4 *Part IV of the Environment Act 1995⁴² places a duty on the Secretary of State to develop, implement and maintain an air quality strategy with the aim of reducing atmospheric emissions and improving air quality. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland⁴³ provides the framework for ensuring compliance with air quality limit values based on a combination of international, national and local measures to reduce emissions and improve air quality. This includes the statutory duty, also under Part IV of the Environment Act 1995, for local authorities to undergo a process of local air quality management and declare Air Quality Management Areas (AQMAs) where necessary.*

Air quality (NO₂) at 6 of the busiest parts of the airport is consistently at illegal levels, shown in LLAL documents for the New Century Park application, but this has been deliberately concealed by taking an average over 25 monitoring points, many in quieter places. The Airport and surrounding area should immediately be made an Air Quality Management Area, and actions taken to cut pollution.

Jams are very costly to the economy, and shorten people's time with their families and leisure time, having adverse impacts on society. New Century Park, and any more airport expansion would increase pollution-related health problems, and the proposed dual carriageway to New Century Park - unnecessary, speculative offices and a hotel (costly and risky to build on landfill) – would join a new access road to Eaton Green Road, causing new rat-runs through residential areas. No aspect of the Transport Assessment addresses this simple but major transport conundrum.

6.2.24 (p80 of LLAL report) LBC is currently in the process of compiling an AQAP52 for AQMA No. 3 (Stuart Street and Dunstable Road areas). The plan was approved by Council Executive in June 2018 and was due to be published in 2018. The area of this town centre site is already inadequate and should be extended: Luton Friends of the Earth tested for NO₂ and found illegal levels outside it. If there are 2 AQMAs in Hitchin (p87 of LLAL report), it is clear that before any new major development, Luton, far bigger and UK's 4th most congested town, needs more AQMAs.

3.3.5 A 'No Development' or 'Do Nothing' option was discounted from LLAL's sifting process on the basis that it does not deliver the strategic economic objectives.

As part of continuing assessment, a 'Do Nothing' scenario will be explored to establish a future baseline for LTN without the Proposed Development. This will be described in full within the ES along with a final description of the alternatives.

No one is suggesting 'Do Nothing', but economic and environmental sustainability must be considered together and an urgent shift in emphasis is needed away from the level of airport expansion proposed. There is therefore **no need to build surface level airport car parks on Wigmore Park**, as the New Century Park application proposes.

*3.3.9/10 Sift 1 was undertaken in autumn 2017 and appraised 7 options against a set of qualitative criteria based on LTN's Vision and key strategic objectives for the project. Each option was appraised by the technical specialist team against the strategic objectives of Strategic Fit, Economic, Social, Sustainability and Environment, Surface Access, Deliverability, Operational Viability and Cost. Environmental **subcriteria** included: noise impact, air quality, natural habitats and biodiversity, carbon emissions, flood risk, archaeology and cultural heritage, landscape and visual impact, climate change resilience, surface and groundwater, and landfill.*

The Environment should NOT be represented as '**sub-criteria**'. Taken together with social, sustainability and transportation/road congestion/pollution ('surface **access**' is only about getting to the airport, not the wider effect on communities), the **disbenefits** totally outweigh benefits (See list below). It is inexplicable why LBC/LLAL chose to interpret 'Making best use of our runway' as to jump immediately to the maximum runway capacity, in the face of all the environmental disbenefits, and not to plan for either a modest expansion within the existing complex, a road within the airport boundary to Century Park fields which already has planning permission for offices or car parks, or no expansion because of unacceptable impacts on local and wider community and their environment. This is **more** shameful because **the people of Luton own the airport**, but were not offered these options. It is **not acceptable** for there to be a small, higher tier of unaccountable people who make major decisions before any consultation with residents about what might be in their best interests. Further, the consultation (which had no options for modest or **no** expansion) contained heavily biased questions to get the 'required' answers.

The Chilterns Conservation Board Statutory Management Plan 2014-2019 'A Framework for Action', is

a **material planning consideration** and contains a vision that states '*tranquillity is conserved and where noise is a problem, peace and quiet is restored, in particular by reducing noise generated by road traffic, overflying aircraft and trains*'.

One of the Board's statutory purposes under section 87 of the CROW Act is '*to conserve and enhance the natural beauty of the AONB*', which is close to the site of this application.

It is hard to see how both these purposes would not be adversely affected by the application.

2.4.15 It remains a puzzle why the New Century Park application should be submitted when the proposed airport expansion and second terminal occupies the same footprint.

3.3.26 *Key considerations: the protection of ancient woodland.* The 'preferred option' shows total destruction of the strip of ancient woodland along the east side of Wigmore Park, due to a new terminal and extensive surface level car parks.

3.4.25 There are two areas south west of LTN, along New Airport Way near Luton Airport Parkway railway station, currently under consideration for use as mid stay and/or employee parking, and car hire and return. If developed as part of this project, these facilities are likely to be multi-storey. If these sites are viable for further parking, there is no need, as we have argued consistently, for any surface level airport car parks on Wigmore Valley Park for the New Century Park application. A large part, or all of the park, can therefore be saved.

3.4.11 *Part of the Proposed Development will be on an area of the former landfill. It will be necessary to excavate approximately 500,000m3 of landfill material to allow for construction. This material will be processed under an appropriate environmental permit and the majority will be reused on-site. Foundations will be piled through the landfill to support the new buildings and infrastructure. These will be designed and constructed to protect the underlying groundwater and in close liaison with the Environment Agency.*

It is a truly shocking, very high-risk, costly, over-ambitious and reckless plan to excavate the whole of the largest landfill site in Luton, in pursuit of a project that would double the present number of flights, dramatically increase climate emissions and have a severe effect on residents of Luton and elsewhere. It is also totally at odds with the New Century Park plan.

Airport owners and operators cannot place themselves above the law, and above the common sense required to protect the environment for the children of today – especially if they are a local council.

National Planning Policy Framework (NPPF) – February 2019 (p80 of LLAL report)

6.2.9 The NPPF was updated in February 2019 with the purpose of planning to achieve sustainable development. Paragraph 181 of the NPPF on air quality states that:

"Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones and the cumulative impacts from individual sites in local areas.

Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the planmaking stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan." See Section 9 above on Air Pollution.

Climate Guidance from Ministry of Housing, Communities & Local Government updated 15/3/2019:

*“Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. These include the requirements for local authorities to adopt proactive strategies to mitigate and adapt to climate change in line with the provisions and objectives of the Climate Change Act 2008, and co-operate to deliver strategic priorities which include climate change. There is a **statutory duty** on local planning authorities to include policies in their Local Plan designed to tackle climate change and its impacts. The National Planning Policy Framework emphasises that **responding to climate change is central to the economic, social and environmental dimensions of sustainable development.**”*

“The Climate Change Act 2008 establishes a legally binding target to reduce the UK’s greenhouse gas emissions by at least 80% in 2050 from 1990 levels. To drive progress and set the UK on a pathway towards this target, the Act introduced a system of carbon budgets including a target that the annual equivalent of the carbon budget for the period including 2020 is at least 34% lower than 1990.”

Airport Expansion would breach our climate change obligations. No explanation is given on how the policy would take account of or act on climate change. See Section 10 above on Climate.

On all this, LBC/LLAL has failed to plan ahead, and failed the public. Signalising several roundabouts was suggested for the first time on 26 Feb 2019, when the project had first been put to the public in 2017. This measure would slow down through traffic and add to pollution and rat runs through residential areas. On one of these roundabouts, on Airport Way, a key route for school pupils, Friends of the Earth already tested for NO₂ and found illegal levels.

6.2.10 Para 170 states that decisions should contribute to and enhance the natural and local environment by:

“e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.”

In view of this, it is hard to see how Luton BC/LLAL could even have considered, or the Environment Agency could have given a provisional go-ahead to, the construction of 4-storey offices and a 5-storey hotel, roads and car parks on the biggest landfill site in Luton.

12) The application fails, judged on criteria of the Local Plan Sustainability Appraisal

Sustainability Appraisal of the Local Plan, 2016: key principles at the heart of the Sustainable Development Strategy used to assess the Local Plan:

Using sound science responsibly
Achieving a sustainable economy
Living within environmental limits

In **2015**, the council had already passed Wigmore Park to LLAL to experiment on.

Insect and animal species are crashing due to human activity. A huge amount of work by Wildlife Trusts and local people goes into managing sites and recording species. But Luton Council does not respect biodiversity or environmental limits, preferring income to biodiversity without a financial value. We are appalled when we see orangutan habitat being destroyed. But our council thinks it OK to devastate local wildlife ecosystems for profit, offering financial bribes to ‘mitigate’ by ‘improving’ other sites. Such mitigation is a lie. When you destroy an ecosystem, it’s gone.



The council's own consultants admit you cannot mitigate against loss of green space & wildlife habitat, or the huge increase in air pollution & climate change the council is planning, because we know this is the first step towards Terminal 2 and double the flights. The ONLY thing that mitigates against pollution and noise is Wigmore Park – and the council wants to destroy it.

Scientific evidence? Precautionary principle? These are just words on a page. Surrounding roads are already at capacity, and much too fast expansion has made us 4th most congested town. LBC plans another 16 million vehicles on our roads, and has the answer to mitigation – add traffic signals to a few roundabouts. It may temporarily allow traffic flow, but it will increase pollution. Do they really think it will compensate for another 16 million vehicles on our already congested, pollute roads?

Another key principle: The polluter pays. "We own the airport." We're our own bad neighbour. Except that the council run it, not us. 16 million more people driving here to fly cheaply from Luton airport. Do they pay? No – WE do. In taxes, loss of green space & wildlife, poorer health, and climate emissions from every extra flight. Is our public servant protecting us? No, they're CAUSING it.

The Local Plan's sustainability appraisal says:

- ② *The airport site has significant ecological value; parts support a local green network*
- ② *Airport development may impact on a landscape conservation area + area of great landscape value*
- ② *Airport activities seen to be significant sources of PM10 and nitrogen dioxide*
- ② *Improved access to the airport will smooth traffic flows from the M1* Has that worked?
- ② *Annual number of aircraft movements estimated to rise from 110,500 in 2013 to 147,500 by 2028*

Already 136,500 in 2018 ! Passengers from 9 to 16m in 5 years!

UK's fastest growing airport & fastest growing source of climate change.

- ② *Reducing carbon emissions - No specific issues identified*

Last year's consultation on expanding to 38m passengers stated: *The UK has made legally binding commitments to reduce carbon emissions through the Climate Change Act (2008). We understand the aviation sector has a key role to play if these are to be achieved.* It's all just words, something to think about in future. This is not good enough.

The IPCC says we must make major changes to the way we do things. Within 12 years rich countries must get to a Zero emissions, fossil fuel free economy. Luton's got worse, not better, and we must not plan to get worse still..

13 Comments made by FoE to the Inclusive Growth Commission *Mar 2019*

"established to ensure residents across Luton are the ones that benefit from the town's growing economy"

A disproportionate amount of growth is from the airport. Instead of investing the large profits in its citizens and environment, the council is throwing money back at the airport, a high-risk growth model damaging residents' health with air pollution and noise, and rapidly adding to climate change to ruin our children's lives.

The key aims of the Commission, under the banner of 'Growing Luton Together', will be on improving skills and productivity, raising aspirations, attracting more quality jobs, supporting communities to remain healthy (but air pollution would get worse), ensuring equality as well as encouraging people to remain and spend their money in the town.

Stop them flying away! This hurts the national economy + adds to pollution, poor health and climate emissions. This assumes growth rather than sustainability. The Economic Growth model is broken, leading to gross inequalities and catastrophic environmental degradation.

A healthy society MUST focus more on social and environmental matters than economy. Rich people getting obscenely richer because too much power is in the private sector and some councils have forgotten that they are public servants.

David Oakley-Hill
Co-ordinator, Luton Friends of the Earth
