



27.2.18

REF: Hearing statement on air quality in relation to the North Hertfordshire Local Plan

Dear Inspector,

Please find below the evidence that I have found within documents ED62 AND ED70 FROM NHDC which I believe oppose the local plan to develop on the land to the East of Luton.

**Examination of the North Hertfordshire Local Plan (2011-2031) Examination hearing sessions
Matter 21 Statement of North Hertfordshire District Council on Air Quality**

p.2 9. The NHDC Transport Strategy aims to reduce car traffic volumes below those informing the transport modelling and seeks to ensure that new developments have sustainable transport built in focusing on walking and cycling and other modes of sustainable transport. **THIS WILL NOT REDUCE CAR USE, THIS MAY PROVIDE EXTRA OPPORTUNITIES FOR PEDESTRIANS BUT WILL BY NO MEANS BE A GUARANTEE OF A REDUCTION IN CARS ON THE ROADS.**

An Overview of Local Air Quality in the District of North Hertfordshire Statement to Support the North Hertfordshire District Council Local Plan 2011-2031 January 2018

The significant source of local air pollution in the district is from the exhaust emissions of road vehicles and so this is the source that the local plan needs to be concerned about. The most significant types of local air pollutants emitted from vehicle exhausts are nitrogen dioxide (NO₂) and particulate matter (PM). **ALSO NEED TO CONSIDER THE DEVELOPMENT OF THE PROPOSED NEW SITE IN SUCH CLOSE PROXIMITY TO THE AIRPORT. WHAT WILL THE IMPACT ON AIR POLLUTION BE IN THIS SPECIFIC AREA?**

p. 18 5.16 There is currently no monitoring of air quality within Letchworth Garden City. **WAS A SITE IN LETCHWORTH NOT ORIGINALLY CONSIDERED TO BE USED FOR HOUSING? WHY NO MONITORING?**

The data displayed demonstrate that there have been intermittent exceedances of the annual mean average Air Quality Objective at a combination of roadside and kerbside monitoring locations. However, such exceedances have not been consistent and none were measured in 2015 and 2016. **WHY ARE WE NOT REFERRING TO THE MOST RECENT DATA/2017?**

P.31 5.6 Local Air Quality Monitoring Data for East of Luton 5.32 There is currently no monitoring of air quality in the area of the district identified as the East of Luton. IF YOU ARE PROPOSING TO BUILD ON THIS LAND THEN WHY IS THIS NOT THE AREA OF MOST INTEREST TO MONITOR?

The monitoring points were located immediately to the east of the Luton Airport runway so as to represent a worst case air quality location with regards to the impact of aircraft emissions. 5.34 Within Table 5.6.1 the results from the historical air quality monitoring locations are displayed alongside the relevant Air Quality Objectives. **HISTORICAL DATA, FROM AN EVER EXPANDING AND**

INCREASINGLY BUSIER AIRPORT IN 2018, HENCE OUTDATED. WHY IS THIS NOT THE PRIORITY AREA TO INVESTIGATE? ONE WOULD SUGGEST IT IS DUE THE FACT THAT CLEARLY AIR POLLUTION WILL BE AT ITS HIGHEST HERE AND THE EVIDENCE WILL CONFLICT WITH THE HOUSING DEVELOPMENT PROPOSALS.

5.39 The data show that the annual mean average Air Quality Objective for nitrogen dioxide was not exceeded at a relevant receptor in 2016. This is the only recent data published by Luton Borough Council. The only two marginal exceedances were measured at an airside location and a kerbside location within the airport boundary and so a relevant receptor is not exposed nor is there a **likelihood** of exposure **because of the absence of housing** or an equivalent receptor within the airport boundary. **NHDC HERE ADMITTING THAT HOUSING WOULD HAVE A NEGATIVE IMPACT!**

2017 Air Quality Annual Status Report (ASR) In fulfilment of Part IV of the Environment Act 1995
Local Air Quality Management June 2017 NHDC

“Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of **heart disease and cancer**. Additionally, air pollution particularly affects the most vulnerable in society: **children and older people**, and those with **heart and lung conditions**. There is also often a strong correlation with **equalities issues, because areas with poor air quality are also often the less affluent areas**”.

Across North Hertfordshire, **where monitoring is undertaken**, the concentrations of nitrogen dioxide (NO₂) have been declining over the past five years, which means air quality has been improving. **REFER TO DOCUMENT ED62 DOC. WHICH STATES THAT LAND NEXT TO EAST OF LUTON HAS NOT BEEN RECENTLY MONITORED.**

As a member of the community living in what is known as “County View”, I strongly oppose the plan to build on the land that we have paid a premium to live by, to enjoy, and to raise our children to enjoy. Living so close to the airport, the risk of air pollution is, as already outlined, high enough. Building an additional 2000 houses, with potentially 4000 cars (two per household), and other means of pollutants through transport and increased inhabitants, poses an even greater risk to the current community.

Regards,

Gemma O’Neill