

From: "Linda.mcottier"

Subject: NHDC LOCAL PLAN 2011-31 INSPECTOR'S ENQUIRY

Date: 1 March 2018 at 16:39:36 GMT

To: Louise St John Howe <louise@poservices.co.uk>

Date of Statement: 28th Feb 2018

Examination: NHDC Local Plan 2011-2031

Matter 17: Air Pollution

FROM: Linda Cottier

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TO: C/O Louise St John Howe (Programme
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In addressing the proposed development of 2100 homes - sites EL1,EL2,EL3 the proposals are fundamentally flawed because:-

- a) NHDC and LBC have not established a strategy and delivery plan that assess the impact of air pollution on the proposed housing development, airport expansions and New Century Park Development.
 - b) Both NHDC and LBC are not fulfilling their statutory duty to comply with air pollution legislation.
 - c) Plans are not sustainable as all the developments and their combined impacts will greatly increase pollution.
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The GOVERNMENT has a 25 year ENVIRONMENT PLAN. It contains a foreword from the PRIME MINISTER

She states that "Our natural environment is our most precious inheritance. We are blessed with a wonderful variety of natural landscapes and habitats. This 25 year Environment Plan sets out a comprehensive and long term approach to protecting and enhancing them in England for the next generation.

Goals are simple; CLEANER AIR AND WATER. Plants and animals which are thriving; a cleaner, greener country for us all."

The SECRETARY OF STATE then continues with his foreword.

"IT IS A GREEN CLEAN GROWTH STRATEGY"

NHDC and LBC have a STATUTORY RESPONSIBILITY to review air quality and

act where concentrates exceed national objectives. DEFRA states that annually local authorities are required to report their review and assessment to them. LBC have failed to comply with this and have been totally complacent.

See Jan 2018 NHDC

Local Air Quality Monitoring Data for East of Luton - it states - no monitoring of air quality historically.

DEFRA's information agrees with this.

The June 2017 NHDC Annual Status Report
Executive Summary

Air Quality in Our Area states -

Adverse Health Effects/heart disease/cancer.

The highest at risk being the vulnerable,

children and older people. There was a strong correlation with equality issues, the less affluent are often those with POOR QUALITY AIR. Particulate matter alone in health is estimated in cost across the UK some sixteen billion pounds per year.

Luton is an INDUSTRIAL, LESS AFFLUENT, OVERPOPULATED TOWN. Many residents fall into a lower income bracket.

NHDC Local Plan 2011-31 - fails to recognise the size and extent of the London Luton Airport Expansion project, which is NOW underway. The Airport is to the East of Luton and the new houses within the NHDC plan are bordering the expanding airport area. The airport and huge additional flights indeed (38 million passengers per year) is absolutely NOT GOING TO REDUCE

POLLUTION LEVELS.

THEREFORE it needs to be SPECIFICALLY HIGHLIGHTED that to the East of Luton, expansion of the Airport and the New Century Park Plans and Developments are in progress NOW!!

In a document by Jennifer Gray - updated 13th Feb 2018

Website: sustainable build.co.uk

It describes the sources of POLLUTION FROM CONSTRUCTION

The Construction Industry is a major source of pollution, responsible for around 4 percent of particulate emissions, more water pollution incidents than any other industry, plus thousands of noise complaints every year.

Although construction activities also pollute the soil, the main areas of concern are AIR, WATER and NOISE

(www.lowemissionstrategies.org)

LES Planning Guidance 2015-2016 Revised
Planning Guidance

See: Low Emission Planning - Policy
Appraisal Note (prepared by Green Sphere on
behalf of LEP)

Document

LOW EMISSION STRATEGIES

This report presents the results and conclusions of work to investigate the scale of emissions harm posed by different development sites, and

to estimate the potential emissions benefits of low emission mitigation measures.

Six reference sites were selected. Base emissions and associated damage was estimated for each site using a combination of tools published by the Low Emission Partnership, DEFRA and DECC.

Results provide general site level estimates of emissions harm associated with existing and planned development.

Area Assessment - this was based on aggregating and actual or projected developments grouped under different reference site types.

Sent from my iPad