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Attached – *Good Council's Charter / Airport / Good Citizens' Charter*

Suggested positive actions – Summary

All these actions would bring positive Health and Environment Impacts.

- a radical programme to meet Luton's ambitious Net Zero targets, which with current policies there is no chance of meeting
- not just monitor noise, pollution and climate emissions, but take swift actions to sharply reduce them
- not just provide sustainable (eg mould-free) homes, with NO foam insulation, but all new homes to be 100% energy efficient (Passivhaus standard); retrofit private as well as council houses; give tips to save energy and money; make at least HALF 'affordable' for younger people; and DON'T build on our last much-needed green spaces
- vital for health and wellbeing: Act to cut car use and congestion, which causes pollution that hangs in the valley, triggering respiratory diseases & heart attacks
- reduce, not expand the airport, a massive greenhouse gas emitter from millions of planes, cars and lorries burning fossil fuels and causing jams and pollution, saving the wonderful County Wildlife Site nature sanctuary at Wigmore Park which forms a vital noise and pollution barrier between homes & airport
- work with businesses and community hubs to provide local GREEN JOBS – well managed businesses focused on community and environment rather than just making money, with locally focused supply chains; and to fit solar panels wherever possible
- work with business parks to encourage firms to work together to promote bus travel and

cycling, cut waste (closed loop reuse & recycling of materials), share supply chains, car sharing & pooling, fleets of hybrid or electric vehicles

- encourage and support small, green-thinking start-up businesses
- encourage food retailers to source and promote local, UK and European-grown food
- plant 3 times more trees, in all parts of the borough, in streets, gardens, community areas and green spaces. Each tree is an ecosystem, a wildlife habitat providing shade in summer, absorbing pollution and water, cleaning the air and helping to reduce the 'heat island' effect of a town – all towns are hotter than the countryside
- give incentives for people to grow/share fruit and vegetables & bee-friendly plants, and keep some of front gardens, not just concrete driveways
- create more wildlife areas in all parks and green spaces
- promote and manage wildlife corridors such as the River Lea walk and routes joining it, and promote walking these corridors
- do more to conserve and restore historic buildings and reduce size & amount of signage.

Local Plan Sustainability Appraisal

A sustainable future is ONLY possible by prioritising Social Need, and Protecting Nature and the Environment which keeps us alive, as highly as the Economy. Currently the chances of Luton becoming carbon neutral by 2040 are zero.

Luton Airport

1.6 p7 *“It is also served by **London Luton Airport** which is growing and plays an important role in the economy of the town.”*

This is a Sustainability Appraisal. **It is NOT SUSTAINABLE for an airport to grow.** That has been repeatedly stated by the government’s cross-party, science-based Climate Change Committee. It is for both economic and many environmental reasons, combining to protect everyone’s future. The government loaned Luton £80m in 2021 **on condition it reduce reliance on the airport.**

2.13 NPPF *“A local planning authority is required to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing a Local Plan.”*

The implication is that Luton should **reduce, not expand** flights and passenger numbers and be **far more proactive** in seeking partnerships to create green jobs, the more local, the better. This fits with NPPF para 8 *“to help build a strong, responsive and competitive economy.”* **2.34** Plans should *“set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.”* Other councils have made more progress. For Luton the bonus of the airport has been a distraction, too easy to rely on. It was more popular when smaller - current airport numbers are harder to manage. If Luton Airport expanded, carbon emissions would overwhelm and **negate all other green initiatives** by the town in Luton’s Net Zero Roadmap.

UK – we must fly less AND adapt and mitigate Climate Impacts.

Chap 3 p49 3.4,3.5 *A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. All the top ten warmest years for the UK since 1884 have occurred this century. A strong reaction is required from planning.*

3.6 *As a mostly urban borough, Luton is particularly likely to experience the Urban Heat Island Effect.*

3.1 / 3.2 *“Emissions for Luton Borough between 2005-2020 have fallen from 6.0t per capita to 2.8t per capita” (By half). **HOW?** Only 0.3 of this in 2020 appears to be from Covid lockdown. One might guess that with a big influx of poor immigrants, and more well-off people leaving, despite a population increase double the national average, and more babies, less would be earned and spent, and less CO₂ emitted, by both consumers and businesses.*

3.19 Good that 100 businesses and LBC staff received carbon awareness training.

3.3 Energy consumption, however, fell much less between 2005-20.

In May 2024 Friends of the Earth won its case in the High Court against the failing climate plan. The government was told to “go back to the drawing board.”

Most UK citizens want to see Britain leading the world in setting standards on climate action. More airport expansion would contravene the Climate Change Act and global commitments.

The vast majority of climate scientists worldwide are worried that too little progress has been made. **1,200 leading scientists** say we face a series of unprecedented challenges where climate and nature are intertwined. Their letter to MPs <https://www.zerohour.uk/can-bill-letter>

The UK government declared a climate emergency in 2019, and Luton followed in 2020. Soon effects worldwide will be irreversible. The Sustainability Appraisal at **2.39 lists two pages** of PPPs under Climate Change Adaption and Mitigation, Energy Efficiency and Waste Minimisation. These are incompatible with airport expansion. **2.40** Delete ‘consider’. **Please ACT NOW, Luton Council, on behalf of all children, in Luton, in UK and across the world.**

The government’s 4 tests applied to the airport

The new government has set 4 tests:

Growth; Impact on: regions; climate; communities including noise & pollution.

No one is calling for Luton Airport to be closed. But it expanded far too quickly, doubling passengers from 2013-2018, increasing pollution, becoming unsustainable. When these tests are applied, Luton Airport should REDUCE flights and traffic.

1 Growth - Flying is BAD for the economy

“Expanding airports won’t deliver economic growth” – NEF report

https://neweconomics.org/2025/01/expanding-uk-airports-wont-deliver-economic-growth?fbclid=IwY2xjawlTBvRleHRuA2FibQlxMQABHZYBEkJvUkwaDkBw5R0wPqGkmjzV2QWefKtOAuB6_harnLdy7MRtXPZU5A_aem_He77dfbt482jOyrWmMNqgg

Tourist deficit

Three times as many people leave the UK to spend money abroad than arrive here to do so, costing the UK billions each year. Emissions from one return flight to New York equal all other fossil fuel burning activities by one person in a year. Imports and exports of goods by plane are tiny compared with other means of transport. For every £1 invested in oil, gas and more flying, renewable energy would bring twice the jobs and GDP growth. (*Chap 3 p55*)

Sustainable Aviation fuels

Rachel Reeves: "SAF has changed my mind on airport expansion." She's been lobbied by big vested interests. The trouble with Sustainable Aviation Fuels? They're not.

https://flightfree.co.uk/post/the-trouble-with-saf/?fbclid=IwY2xjawlTB3FleHRuA2FibQlxMQABHRWDOeR8324l6XD1cBX-80A-upgpmAbUU_wA9Sgfe2rEfsSRAHURZzNKNA_aem_nsBN974hECcSY4Tw2YW4w

Carbon Offsetting has been discredited

– so don't do anything that hurts people, nature or the environment !

<https://www.theguardian.com/environment/2023/jan/18/revealed-forest-carbon-offsets-biggest-provider-worthless-verra-aoe>

<https://www.greenpeace.org.uk/news/the-biggest-problem-with-carbon-offsetting-is-that-it-doesnt-really-work>

If Heathrow, Gatwick and Luton expanded, **it would wipe out all the carbon savings and progress in green energy across the country.**

The fast-growing climate crisis in 2024 cost \$320 billion globally, **double the year before.**

2 Climate action - creating a sustainable future for all

Every flight burns fossil fuels – “Sustainable Aviation Fuels” is an oxymoron, and “Carbon Offsets” don't work. (*see links above*) Claims about “SAF” are false. Biofuels destroy prime UK agricultural land and irreplaceable biodiverse rainforests to grow palm oil. It would take all our farmland to grow enough fuel crops for UK domestic flights only. This would not compensate for extra flights – we need to cut flights to burn less fossil fuel. Oil should be left in the North Sea, as decades in the future, it will be needed for vital uses.

50% of people never fly, and subsidise fliers who are causing environmental damage for all. A responsible way to cut flights is to tax frequent fliers and private jets, and stop promoting new destinations.

3 Communities, including noise and pollution (*see **Health, wellbeing and air pollution***)

If Luton Airport expanded further, thousands of planes, cars and lorries would burn more fossil fuels, adding to jams and pollution, harming health and reducing people's leisure time. With no expansion, the vital County Wildlife Site nature sanctuary at Wigmore Park is preserved, forming a noise and pollution barrier between homes & airport, protecting people's health from kerosene fumes that when near the runway you can feel hurting your lungs. This fits with **NPPF para 8** “*to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*”

Luton is the wrong place for a big airport – people suffer from respiratory and heart problems due to pollution in a valley below the airport, and from noise below flightpaths. Luton has high car use, and the airport makes it far worse. In 2018-19, four reports found it was the most polluted town in UK, due to doubling from 9 to 18m passengers in 5 years, doubling vehicles. It is the worst airport for night flight noise, giving too small a period for proper sleep.

3.58 *"Luton Airport plays an important role in the Luton economy"..*

Airport jobs are mainly poor, zero-hours contracts. Traffic jam delays harm the local economy.

2.37 *"The Local Plan, as supported by the SA, should seek to identify opportunities to maximise potential for alternative modes of transport to the car and reduce the need to travel, therefore reducing emissions."*

The Local Plan has been saying this for decades but traffic use has soared.

Housing and green infrastructure

The map on p8 shows that Luton is severely overdeveloped, with lower than the minimum of parks and green spaces. These are well maintained by the council, but the government should not attempt to impose too much housing on the town – there is simply not enough space. Any more high-rise would be dangerous and likely to increase ghettos of poverty.

The quality of the town centre has declined rapidly in recent years – **3.119** notes the very bad condition of Conservation areas. Front gardens have been turned into driveways, and many older people who had lived here for years have disliked the changes and moved away. Communities have arrived from many different countries, and partly because they do not value the town, are thoughtless with litter. There is a planning emphasis on beautiful buildings, which Luton should prioritise to help reverse the decline.

2.60 *Planning authorities should consider setting out approaches in their Local Plan to promote the viability of Town Centres as well as Local Centres.*

Much of the housing near the two main stations is used by people who commute to London, and are less likely to think of themselves as Luton citizens.

For **non-residential** buildings including schools, strong encouragement should be given for energy and water efficiency and solar panels. **3.19** Good to hear of SUDS in schools – how many? Also COP26 school packs. New build should be Passivhaus or BREEAM excellent. Special efforts should be made to conserve Trees and incorporate them in design.

2.33 *There is a requirement for the planning system to identify and coordinate the provision of infrastructure.*

Despite this, and Luton's roads being inadequate for traffic volumes, a masterplan for a huge new housing development of 2,100 homes has been approved at Mangrove Green and Cockernhoe, which goes against longstanding guidance not to join up or coalesce and overwhelm villages, destroying their character. These villages have only a narrow, east-facing road with passing places. **This may need to change under revised NPPF.**

Luton Council should continue to oppose strongly the proposed M1-A6 link, which would cause gridlock and increase pollution.

Parks & green spaces - good for your health, must be better for wildlife

There is a nature crisis - we must take action. <https://www.wwf.de/fileadmin/fm-wwf/Publikationen-PDF/WWF/Living-Planet-Report-2024-English-Version.pdf> Section 4 – Sustainable solutions

All Luton's parks and or green spaces are valuable, and none should be built on.

3.19 Biodiversity and resilience – it is very disappointing that beautiful, century old, mature trees (whole eco-systems) were felled around Wardown Lake. This should be a last resort. Still no Green Flag status for Luton's second largest park, Wigmore District Park, a County Wildlife Site and Area of Local Landscape Value (yet **not mentioned** in **3.120** Landscape), twice voted one of the best parks in the East of England. It has been assessed by experts as the equivalent of SSSI status.

Its building that should have become a café and toilet was recently demolished.

3.46 A Friends of the Earth report found that nearly half Luton's neighbourhoods have poor access to green space.

A core **NPPF** planning principle (**2.20**) is to “*support the transition to a low carbon future in a changing climate. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage reuse of existing resources, including conversion of existing buildings* (**Note: far too many buildings in Luton have been demolished rather than converted**); *and support renewable and low carbon energy and associated infrastructure. Local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, water supply, biodiversity and landscapes*”.

NPPF 2.22 is especially relevant in an overdeveloped town like Luton – action can be led by the Local Access Forum, Parks & Countryside Service, Friends of Parks and Green Spaces Luton Green Hub and local community groups:

Plans should “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including 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. Plans should promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity.”

Renewable energy

Onshore wind is at last possible under the new government. It is far cheaper than offshore, and uses far fewer materials. There are many windswept places across the UK, and solar farms should be spreading fast but are not. Battery storage makes them practical at a local level. Both onshore wind and solar need to bring residents with them from the start to be sited carefully and offer local payback. Scotland is way ahead of England on this. Small and local is best. Luton has launched a community energy scheme, for bigger projects and people living in substandard homes.

Every business / organisation should be approached to install solar panels and green roofs.

3.17 Good that PV panels in Luton doubled between 2014 and 2022, + 2 wind turbines.

3.19 Useful summary of actions to cut emissions.

Water and the River Lea

Luton is in the East of England, the driest area of the UK, with most of the world's rare chalk streams, which need protecting. **3.73** There is too much abstraction and not enough reservoirs in Luton **3.79** (the stream from Houghton Regis is seasonal), bringing pressure on water supplies and sewage capacity, so new housing should only be provided sparingly. See **Water and Air 2.56**.pp40-41.

2.57 *Local planning authorities should seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply.*

2.57 *Local planning authorities should **set out** approaches in their Local Plans to promote the efficient use of water and **limit all types of pollution including water and air pollution**. They should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. Air Quality Management Areas (AQMAs) **should apply for a mile around the airport in all directions**. Authorities should **set out** approaches in their Local Plan to factor in the contribution that specific site options can make to achieving modal shift and limiting the need for residents to travel. **This applies to the airport and all businesses**.*

Disturbing the landfill site beneath Wigmore Park for a new airport terminal risks contaminating the Rivers Mimram and Lea. The Lea at Luton Hoo lake has already received several doses of contamination from airport run-off, killing fish and wildlife.

The River Lea belongs to all residents. This key wildlife corridor should be accessible to all throughout its route for residents and visitors to enjoy, especially as a feature of our town along Power Court where the football stadium is to relocate. This will bring development that would detract from the setting of Luton's only Grade I listed building, St Mary's Church. This can be mitigated by opening up the river and creating a tree-lined walkway opposite, providing a river walk south of the town as in the north.

Under the revised NPPF, a site's setting, landscape and surrounding greenspaces must be improved.

Health, well-being and air pollution

The Sustainability Appraisal, pages 35 & 36, lists relevant national PPPs.

3.83 Air pollution *"Air pollution is the largest environmental risk to public health in the UK."* It is the greatest threat to health in Luton, leading to high levels of respiratory diseases, lung conditions and heart attacks. It affects the most vulnerable, and stops people working.

This is due to well above average levels of driving in a dense urban area, made far worse by millions of journeys to the airport by passengers, employees and delivery drivers. This pollution is all the more dangerous because it settles in the valley below the hill on which sits the airport. **3.63** Luton has high levels of in and out commuting for work. Between M1 junction 11 and the town centre, pollution in the morning peak has often been recorded as 3 or 4 times the legal limit. This would have a measurable health effect on anyone stuck in traffic. In 2018, 4 separate reports found that Luton was the most polluted town in the UK. Air Quality Monitoring is not enough. **Urgent action** is needed to reduce danger, beginning with **cutting air travel**, and working with businesses, especially at the airport, on strategies

to **cut car commuting**. This should include car pooling, car sharing, and financial rewards for using buses or cycling.

Friends of the Earth's well-publicised anti-idling campaign in St Albans has had some effect.

3.84 Luton BC's "**Engines off**" anti-idling and pro-cycling campaigns should continue.

2.45 Delete 'offer the opportunity to'. Local Plans **should** maximise the well-being benefits of well-designed local green spaces, and **ensure** that open space and green infrastructure is of sufficient quantity and quality to meet the needs of the Plan area, **encouraging** healthy and active lifestyles.

Environment – think positive!

Some useful PPPs are listed on pp37-38.

Because wildlife and ecosystems are threatened and in decline, so no more should be lost -

2.49 Rewrite: first 2 sentences to show that the council will carry out positive action:

The Local Plan should try to avoid, and keep to an absolute minimum, any adverse impacts on biodiversity and geodiversity, and important landscapes (including designated sites) and higher value soils. The Local Plan will ensure that ecological features and biodiversity are managed, protected and enhanced and that opportunities are taken to restore or create habitat.

2.50 Rewrite to show positive intention and commitment:

The plan will protect non-designated landscapes identified as particularly sensitive to development, and non-designated habitats which form part of the wider ecological network. The plan will also promote any net gains in biodiversity.

2.51 Rewrite to show positive intention:

In terms of the location of development, the Local Plan will encourage re-use of brownfield land, and protect more valuable agricultural soils from development, where this is relevant to Luton Borough. The allocation of new sites for development and updated planning policy will be used to achieve better habitat connectivity by providing new green infrastructure and by requiring biodiversity net gain.

Procurement – a fundamental part of a sustainable future

We would like to see **the council proactive in establishing an ethical procurement policy**. This would begin to address abuses not just by suppliers and contractors to the council, but services for the public, and many company supply chains operating in Luton – from deforestation for palm oil, land-grabbing from Indigenous communities, plastic dumping, to slave labour, to prioritising the sourcing of local food and other goods, and helping responsible, smaller companies who are trying to be green and act for a sustainable future.

3.19 Good to see Kingsway depot sources 90% of equipment locally. But unclear how and what proportion of LBC's other needs are sourced. Central depot – what's the source of biomass?

3.96 Waste – see comments below on Roadmap diagram

Note: the NPPF (National Planning Policy Framework) was revised in Dec 2024.

Affordable housing should make up 50% of any development.

Infrastructure improvements will be needed to support development.

Green spaces must be enhanced as well as, where possible, a site's surrounding landscape setting.

Comments on Luton Net Zero roadmap

ROADMAP DIAGRAM

Awareness raising: Why do we have to wait until the late 2020s for people to **make informed choices?** There could be a great many quick wins. Engagement with the public seems so far to have been highly selective, not general. It is good to target certain groups, but at the same time there should be simple, general advice for everyone. LBC should encourage people to eat less meat – one of the biggest contributors to climate change and also to pollution of rivers and seas.

Whole street retrofit of homes: Following the Net Zero showhome, street by street should follow immediately.

Financial incentives for change: As soon as results are known for air and ground source heat pumps, the choice, with big discounts, should be offered by a range of reputable fitters, as well as insulation, double glazing and solar panels with inverters and battery storage. Trenches should be dug at the edge of parks for ground source heat pumps, alongside suitable buildings, domestic or commercial, that can receive heat from below ground. Properly planned, this can be done at scale to make savings.

New jobs and skills in the supply chain: by now, after work on procurement and discussion on partnerships with businesses on climate & environmental action, some green jobs should be ready to go.

Reduce Waste and Reuse: ACTION NOW - this cannot be left until the late 2030s!

The diagram suggests that waste is only 1%, but there are many knock-on effects, including public attitude and commitment, and the impact of not reducing, reusing or recycling is much greater. Turkey and Asia have become polluted dumping grounds for Britain's waste – this is grossly irresponsible. Far too much recyclable material is wasted, and incineration fuels climate change. Collecting litter, while essential, is playing catch-up – Luton must educate at all schools to emphasise **prevention**.

Food waste collections were trialled but stopped. ***Luton is now acting illegally in not collecting food waste***, as surrounding boroughs have been doing for some time.

Ten years ago, 40% of Luton's waste was recycled. Today it is only 30%.

It is time to revive Mick Wright's partnership with the University: After a week's training, 8 students went door to door in pairs, discussing recycling knowledge and habits with householders, answering questions about what plastics can be recycled and which bin to use, or where reusable clothes and textiles could be taken. Within a year the recycling rate had risen by 10%.

Access to green space: Improving and publicising walking/cycle routes along wildlife corridors as Rights of Way to bring green spaces nearer to people's homes, as well as creating new pocket parks and areas to grow fruit & vegetables, can be led by the Local Access Forum.