

RESPONSE TO LOCAL PLAN CONSULTATION FEBRUARY 2025.

Dear Luton Borough Council planning department,

The two largest Green House Gas (GHG) emitting sectors in the Luton Borough Council (LBC) area are **transport and housing**. The new Local Plan must be based firmly around reducing GHG emissions in these and all other sectors to achieve net zero by 2040 (or before) as stated in the LBC 2020 **Declaration of Climate Emergency**. Please be very clear, there is absolute certainty that LBC will be totally unable to meet this target if the planned expansion of Luton Airport goes ahead.

For the avoidance of doubt, so called **Sustainable Aviation Fuel** (SAF) is not actually sustainable and never will be, will not reduce the emissions due to Air Transport one jot so the new Local Plan must ensure that Luton Airport activities **reduce** their GHG emissions in line with the stated 2040 target of net-zero, this will mean **fewer flights** and **fewer passenger numbers** not more of both.

The vast amounts of money needed to expand Luton Airport should be repurposed into reducing the emissions and pollution caused by vehicle traffic in and around the LBC area by providing low cost, high quality, frequent, fast, reliable, accessible public transport infrastructure which should be facilitated by the new Local Plan.

As well as better public transport links the Local Plan must enable safe, accessible walking and cycling routes, targeting commuters not just social, domestic and pleasure users, this will improve the health outcomes for the local community thus reducing the burden on the NHS and no doubt creating many new “green jobs”.

Reduction in air and vehicular traffic will also have the beneficial effect of improving health outcomes (mental and physical) within the LBC area by reducing airborne pollution and noise.

The Local Plan must be very clear that no new housing development will be permitted unless the houses are net-zero at time of first build i.e. built to **Passivhaus standards** and not requiring retrofit to make them energy efficient as most houses built in the UK today do require. This will create many new high skill sustainable jobs in the building sector.

The Local Plan should ensure that development, where permitted, will include large publicly accessible areas of open space, on site, containing a variety of native species of plants and woodland, and in all cases exceeding the requirements set out in the governments Biodiversity Net Gain legislation. Safe cycling and walking routes, greatly restricted car parking and increased or improved local services must be provided by the developer and detailed in the Local Plan. This will also have a positive impact on local health outcomes particularly mental health.

The Local Plan must make very specific allowance for “**doubling nature**” with firm, enforceable targets and dates.

And if you get a minute the Local Plan must include a section detailing plans for providing local community renewable energy generation, know as a Local Area Energy Plan (LAEP)

Regards,

Rod Hart
Letchworth Garden City

