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London Luton Airport Expansion

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7.12 Surface Access Strategy

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7.12 SURFACE ACCESS STRATEGY

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EXECUTIVE SUMMARY

Surface access refers to the trips made by passengers, visitors, staff, and goods travelling to and from the airport, that are made by different types of transport. As the airport grows, there will be an increase in travel demand to and from the airport which needs to be carefully managed to minimise the impact on surrounding communities and the environment.

This **Surface Access Strategy** (SAS) **[TR020001/APP/7.12]** presents the vision and objectives of Luton Rising (the Applicant) for surface access and the priority areas and interventions that form the Applicant's approach to achieving this vision. It is strategic in nature, helping to shape and guide the long-term growth of the airport. The vision and objectives of the SAS will be realised through the preparation of Travel Plans (TP), produced every five years, which will set out the specific interventions and Targets for surface access during that shorter time period.

The emerging SAS was presented during the 2022 statutory consultation, key themes emerging from the feedback were that the passenger and staff mode share Targets should be more ambitious, including Targets focused on user experience. Other feedback highlighted the need for more frequent staff surveys to provide better insights into staff behaviour, a clearer approach to monitoring and more ambitious approach to decarbonisation of transport.

The SAS sets the vision for how the Applicant and operator will work with partners to contribute towards high quality, efficient, reliable, and sustainable surface access for all airport users, and to provide for growth while supporting the needs of local communities. The Applicant will provide the maximum benefit to the local and subregional economy whilst actively managing surface access impacts in line with the commitment to responsible and sustainable development.

In order to achieve its vision, there are five objectives:

 a. increase air passenger public transport mode share;

 b. increase employee sustainable travel mode share;

 c. support Luton Borough Council's climate ambitions;

 d. strive to be the best possible neighbour to communities and authorities; and

 e. contribute towards the local economy through multi-modal transport links.

The SAS has both Limits and Targets, with Limits set out in the **Green Controlled Growth (GCG) Framework [TR020001/APP/7.08]** and Targets set out in the five-year TPs. GCG Limits for surface access relate to two specific Targets for reducing passenger and staff mode shares by non-sustainable modes and also includes a surface access Green House Gas (GHG) emissions Limit, based on the net total of GHG emissions (which is inclusive of offsetting). Within the TPs the operator will also set Targets for other surface access-related indicators. The diversification of Targets will allow for the collection, analysis and ongoing review of more granular data and an improved understanding of how interventions and measures are performing.

Prior to the Covid-19 pandemic the airport had an increasing share of public transport for both passenger and staff, however since then changing behaviours have impacted travel to the airport and users' choices towards private transport. Currently the airport has a number

of transport improvements underway to improve access to the airport. Most significant is the opening of Luton DART, a fully automated transport system to move passengers between Luton Airport Parkway station and the existing airport terminal. The journey time from London St Pancras will reduce to just over 30 minutes, competitive with other airports serving the London aviation market. Supporting the improvement to connections from Luton Airport Parkway are improvements to the rail service, increasing the number of services and destinations served from Luton Airport Parkway station.

A key part of the development of the proposals for this SAS has been the identification of priority areas and supporting interventions to influence how passengers and staff travel to and from the airport. This SAS sets out the toolbox of potential measures, grouped under six priority areas, Luton DART and Rail; Vehicle Access, Parking; Private Hire Vehicles and Taxis; Bus and Coach; Walking and Cycling; Highway Interventions; and Technology and Communications.

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1 INTRODUCTION

1.1 The Proposed Development

1.1.1 This document has been prepared to support the proposed expansion of London Luton Airport ('The Proposed Development'), proposed by Luton Rising (the Applicant). Luton Rising is a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit. Luton Rising is at the heart of a movement for positive change in the Luton community.

1.1.2 The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands to the north east of the runway. This will take the overall passenger capacity from 18 mppa to 32 mppa.

1.1.3 In addition to the above and to support the initial increase in demand, the existing infrastructure and supporting facilities will be improved in line with the short-term requirements for additional capacity.

1.1.4 Key elements of the Proposed Development include:

a. Extension and remodelling of the existing passenger terminal (Terminal 1) to increase the capacity;

b. New passenger terminal building and boarding piers (Terminal 2);

c. Earthworks to create an extension to the current airfield platform; the vast majority of material for these earthworks would be generated on site;

d. Airside facilities including new taxiways and aprons, together with relocated engine run-up bay and fire training facility;

e. Landside facilities, including buildings which support the operational, energy and servicing needs of the airport;

f. Enhancement of the existing surface access network, including a new dual carriageway road accessed via a new junction on the existing New Airport Way (A1081) to the new passenger terminal along with the provision of forecourt and car parking facilities;

g. Extension of the Luton Direct Air to Rail Transit (Luton DART) with a station serving the new passenger terminal;

h. Landscape and ecological improvements, including the replacement of existing open space; and

i. Further infrastructure enhancements and initiatives to support the target of achieving zero emission ground operations by 2040[1], with interventions to support carbon neutrality being delivered sooner including facilities for greater public transport usage, improved thermal efficiency, electric vehicle charging, on-site energy generation and storage, new aircraft fuel pipeline connection and storage facilities and sustainable surface and foul water management installations.

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[1] This is a Government target, for which the precise definition will be subject to further consultation following the *Jet Zero Strategy,* and which will require further mitigations beyond those secured under the DCO.

1.1.5 A full project description is provided in **Chapter 4** of the **Environmental Statement** (ES) **[TR020001/APP/5.01]**.

1.2 What is Surface Access?

1.2.1 Surface access refers to the trips made by passengers, visitors, staff, and goods travelling to and from the airport that are made by different types of transport. This includes travelling to or from the airport by public transport, taxis, cars, lorries, walking, and cycling. It does not include trips by aircraft (e.g., transfer passengers).

1.2.2 As the airport grows, there will be an increase in travel demand to and from the airport which needs to be carefully managed to minimise the impact on surrounding communities and the environment. This will require investment in new transport connections and sustainable transport solutions, particularly public and active transport, supported by wider changes in travel behaviour.

1.3 Managing Surface Access at the airport

1.3.1 The airport is at a turning point in its history. With the opening of the Luton DART rail connection in 2023, the airport will be directly connected to the national rail network for the first time. This will make it easier and quicker to access the airport by public transport and provide a solid foundation for increasing the number of passengers and staff who travel to the airport by public transport. Placing Luton DART at the heart of this Surface Access Strategy (SAS) is a central part of the Applicant's plans for delivering sustainable growth at the airport. The Applicant will strive for sustainable journeys to be the first choice for those accessing the airport. The Proposed Development will enhance public transport infrastructure at the airport with increased bus and coach capacity proposed at Terminal 1 and new facilities at Terminal 2 that separate coach and bus activities.

1.3.2 As the airport's owner and the Applicant submitting the application for development consent, Luton Rising has a significant role to play in shaping the airport's long-term future. The Applicant needs to manage surface access to ensure it is high quality, efficient and reliable and does not give rise to unacceptable congestion or environmental impacts, whilst supporting delivery of the wider vision for the airport's expansion. The Applicant will do this through this SAS.

1.3.3 Day-to-day management, operation and development of the airport is the responsibility of London Luton Airport Operations Limited (LLAOL) – 'the operator' – under the terms of a concession agreement that currently runs to 2032. It is the Applicant's intention that those that operate the airport over the short and longer term must do so having full regard to all of the obligations that the DCO places on them in regard to the implementation of future growth, including those related to this SAS and the accompanying **Framework Travel Plan** (FTP) **[TR020001/APP/7.13]**. Further details regarding future governance and implementation arrangements, and how this is reflected in the **Draft DCO [TR020001/APP/2.01]** are set out in Section 8.2.

1.4 The role of the Surface Access Strategy (SAS)

1.4.1 This document presents the Applicant's vision and objectives for surface access and the priority areas and interventions that form the Applicant's approach to achieving this vision. It summarises how the implementation of the SAS and progress against its objectives, including mode share Limits and surface access Targets, will be monitored in the future through the **Green Controlled Growth (GCG) Framework [TR020001/APP/7.08]** and the **FTP [TR020001/APP/7.13]** respectively.

1.4.2 This SAS will cover a 20-year period and therefore it is strategic in nature, helping to shape and guide the long-term growth of the airport. The vision and objectives of the SAS will be realised through the preparation of future Travel Plans (TP), produced every five years, which will set out the specific interventions and Targets for surface access during that shorter time period. These future TPs will also fulfil the policy requirements of the Aviation Policy Framework (Ref 1.1) relating to Airport Surface Access Strategies (ASAS). The framework for these future documents is contained in the **FTP [TR020001/APP/7.13]**.

1.4.3 It is the intention that the responsibility for producing these TPs as part of the wider implementation of the SAS will in future fall onto the operator, and this document has therefore been drafted as such. The mechanism by which this responsibility will be transferred is discussed later in the document in Section 8.2.

1.4.4 To ensure the Applicant's approach to surface access remains effective in the long-term, especially given the uncertainty when looking 20 years into the future, flexibility is a key principle of this SAS, with monitoring, review and adaptivity ongoing throughout the SAS's 20-year duration. The requirement to periodically review and update future TPs every five years will continue beyond the duration of this strategy in perpetuity as set out in the FTP.

1.5 Statutory Consultation 2022

1.5.1 The Applicant presented the emerging SAS during the 2022 statutory consultation, which ran from February to April 2022. The key changes the Applicant has made in response to feedback received through this process are as follows:

    a. *More ambitious mode share Targets* – the Applicant received feedback that the passenger and staff mode share Targets should be more ambitious than the Applicant presented as the indicative Limits for surface access in the Draft Green Controlled Growth Proposals document presented at statutory consultation. In response, the Applicant has set out a process for identifying more ambitious Targets in the FTP, including additional Targets focused on specific modes and user experience. This document details how the operator will set and monitor those Targets.

    b. *Change staff survey from biennial to annual frequency* – to provide a more robust review and monitoring process for staff, the operator will commission annual staff travel surveys. The operator will also commence

employer travel surveys, to better understand the staff and travel arrangements at the 40+ companies that operate at the airport. In addition, snapshot surveys of various surface access related indicators will be undertaken to provide more dynamic monitoring of specific interventions (see Section 7).

c. *A clear approach to monitoring* – a number of consultation responses stated that there needed to be greater certainty and transparency as to how environmental effects, including surface access, would be measured and reported. To address this, the Applicant has developed a Surface Access Monitoring Plan as part of the **GCG Framework [TR020001/APP/7.08]**, specifically for the monitoring of the GCG surface access Limits, with additional monitoring requirements set out by the **FTP [TR020001/APP/7.13]**, and the Outline Transport Related Impacts Monitoring and Mitigation Approach (Outline TRIMMA) included as part of **Transport Assessment** (TA) **[TR020001/APP/7.02]** (see Section 7).

d. *Decarbonisation of Surface Access* – the Applicant received feedback that GCG should be used to drive more ambition around reducing greenhouse gas (GHG) emissions from surface access. In response, the Applicant has aligned the Applicant's surface access GHG Limit with the commitment the Applicant made through the Luton Rising Net Zero Strategy (Ref 1.2) to be carbon neutral for surface access by 2040. This SAS supports this ambition by striving to maximise sustainable trips which give rise to lower GHG emissions and minimise those which give rise to higher GHG emissions.

1.5.2   The Applicant has had regard to all feedback provided on the emerging SAS, which formed part of the 2022 statutory consultation. Where changes suggested in consultation feedback have not been made, further reasoning for this decision is set out in the **Consultation Report [TR020001/APP/6.01]** which supports the application for development consent.

1.6   Structure of the document

1.6.1   The remainder of this document comprises the following chapters:

a. Chapter 2: the policy requirements for a Surface Access Strategy;

b. Chapter 3: the Applicant's 20-year vision and objectives for surface access at the airport;

c. Chapter 4: surface access at the airport today, the transformational change in progress and ongoing challenges;

d. Chapter 5: the Applicant's surface access Limits and Targets;

e. Chapter 6: the Applicant's priority areas to manage the impacts of expansion and work towards the mode share Limits and surface access Targets;

f. Chapter 7: the Applicant's approach to the delivery and monitoring of the strategy and the role of the FTP and GCG Framework; and

g. Chapter 8: the governance and funding of the TPs and GCG Framework.

1.6.2 The SAS does not include construction-related interventions. However, working with the Applicant's construction partners will be crucial to understand how the Applicant can minimise emissions and adverse impacts by construction-related vehicle movements during construction of the Proposed Development. The **ES Appendix 18.3: Outline Construction Traffic Management Plan [TR020001/APP/5.02]** and the **ES Appendix 18.4 Outline Construction Workers Travel Plan [TR020001/APP/5.02]** provide further details on how this will be achieved during construction.

1.6.3 The **ES Appendix 18.3: Outline Construction Traffic Management Plan [TR020001/APP/5.02]** also includes detail on construction traffic, construction routes and closures and any impact on emergency service vehicle routing.

1.7 Relationship to other documents

1.7.1 The relationships between the various surface access documents submitted as part of the application for development consent that are connected to, or informed by, this document are summarised in Figure 1.1: Surface access document map and Table 1.1: Surface Access document overview.

Figure 1.1: Surface access document map
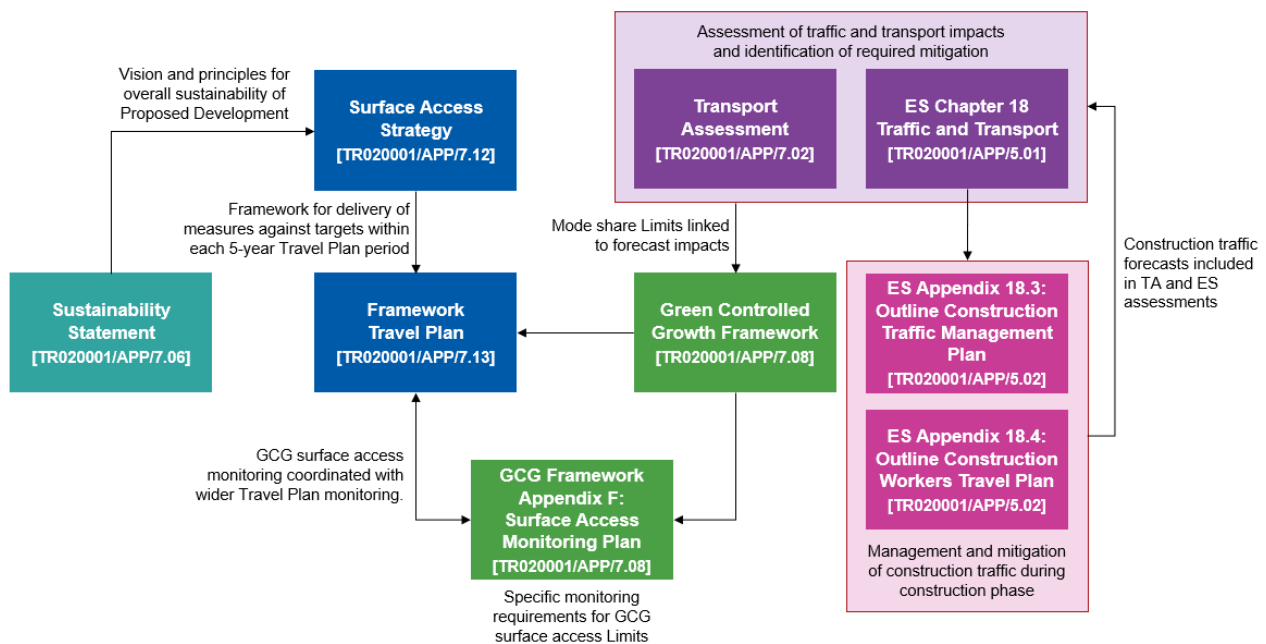
Table 1.1: Surface Access document overview

Document	Doc. Reference	Purpose
Sustainability Statement	TR020001/APP/7.06	Sets out how Proposed Development has been designed to be constructed and operated sustainably. The fundamental principles which are addressed through the Sustainability

Document	Doc. Reference	Purpose
		Statement are: a. protect and enhance the natural environment; b. deliver climate resilience and business continuity; c. lead the transition to carbon net zero; d. become a national hub for green technology, finance and innovation; and e. be a place to thrive.
Surface Access Strategy (SAS) (this document)	TR020001/APP/7.12	This is this document. Covering a 20-year time period, the SAS sets out the long-term vision and objectives for surface access to guide the long-term growth of the airport.
Framework Travel Plan (FTP)	TR020001/APP/7.13	As the implementation plan for the SAS, this document sets out a framework for the content of TPs which will be produced should consent for the Proposed Development be granted. The FTP submitted as part of the application for development consent contains a longlist of interventions and measures, further information about how Targets will be set, and details about the role of the Travel Plan Coordinator.
Green Controlled Growth Framework	TR020001/APP/7.08	Sets out processes for monitoring and mitigating environmental effects in four environmental topics, including Surface Access, based on defined legally binding Limits and Thresholds. Includes the GCG Surface Access Monitoring Plan as Appendix F, which defines how/what/when monitoring takes place for passenger and staff mode share Limits. Further detail on the GCG Framework is provided in the accompanying **GCG Framework Explanatory Note [TR020001/APP/7.07].**
Transport Assessment	TR020001/APP/7.02	Assesses the impacts of the Proposed Development on all transport modes, proposes measures to mitigate the impacts and assesses the operation of the mitigated transport network, and describes mitigation schemes.

Document	Doc. Reference	Purpose
Equality Impact Assessment	TR020001/APP/7.11	Assesses the impact of the development on Protected Characteristic Groups as defined in the Equality Act 2010. This includes inclusive and accessible transport and access options to and from and within the site for all.
Chapter 18 Traffic & Transport of the ES	TR020001/APP/5.01	Assessment of the potential effects of the Proposed Development on traffic and transportation. This includes the traffic and transport impacts on all relevant modes of transport, including cars, goods vehicles, public transport, walking and cycling.
Appendix 18.3 of the ES: Outline Construction Traffic Management Plan	TR020001/APP/5.02	Sets out a plan for reducing construction traffic impacts on the highway network.
Appendix 18.4 of the ES: Outline Construction Workers Travel Plan	TR020001/APP/5.02	Sets out a plan for reducing construction-related workforce trips from impacting on the highway network.

2 POLICY REQUIREMENTS

2.1 Relevant policies

2.1.1 The Applicant has prepared this document with consideration of relevant Department for Transport (DfT) policies relating to surface access, including:

a. DfT Circular 02/2013 - The Strategic Road Network and the Delivery of Sustainable Development (2013) (Ref 2.1)

b. Aviation Policy Framework (2013) (Ref 1.1)

c. National Policy Statement for National Networks (2014) (Ref 2.2)

d. Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (2018) (Ref 2.3)

e. Beyond the horizon: The future of UK aviation: making best use of existing runways (2018) (Ref 2.4)

f. Transport Decarbonisation Plan (2021) (Ref 2.5)

g. Jet Zero Strategy: Delivering net zero aviation by 2050 (2022) (Ref 2.6)

h. Flightpath to the Future (2022) (Ref 2.7)

2.1.2 Within the *Aviation Policy Framework* (Ref 1.1), DfT recommend that airports produce Airport Surface Access Strategies to set out:

a. analysis of existing surface access arrangements;

b. Targets for increasing the proportion of journeys made to the airport by public transport by passengers and cycling and walking by employees. There should be short- and long-term targets;

c. consideration of whether freight road traffic can be reduced;

d. consideration of how low carbon alternatives could be employed;

e. short-term actions and longer-term proposals and policy measures to deliver on Targets such as:

f. proposed infrastructure developments e.g. light rail;

g. car/taxi sharing schemes;

h. improved information provision on public transport, cycling and walking options;

i. car park management;

j. through-ticketing schemes;

k. indication of the cost of any proposals;

l. performance indicators for delivering on Targets;

m. monitoring and assessment strategies (internal and external); and

n. green transport incentive schemes for employees.

2.1.3 *DfT Circular 02/2013 - The Strategic Road Network and the Delivery of Sustainable Development* (Ref 2.1) sets out the way in which National

Highways will engage with the development industry to deliver sustainable development and, thus, economic growth, whilst safeguarding the primary function and purpose of the strategic road network. The circular supports the preparation and implementation of travel plans that promote the use of sustainable transport modes, such as walking, cycling and public transport as an effective means of managing the impact of development on the road network, and reducing the need for major transport infrastructure. A revised circular was subject to public consultation in Summer 2022, which included, of relevance to the Proposed Development, strengthened environmental policies in response to the transport decarbonisation plan and the drive towards zero emission transport.

2.1.4 DfT's *National Policy Statement for National Networks* (NPSNN) (Ref 2.2) sets out the need for, and Government's policies to deliver, development of Nationally Significant Infrastructure Projects (NSIPs) on the national road and rail networks in England. It provides planning guidance for promoters of NSIPs on the road and rail networks, and the basis for the examination by the Examining Authority and decisions by the Secretary of State. Regarding airports, the document recognises the need to improve the integration between the transport modes, including the linkages to ports and airports DfT's *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England* (2018) (Ref 2.3) provides the primary basis for decision-making for an expanded Heathrow Airport. Whilst its surface access Targets do not apply to Luton's expansion, its description of the Government's objective for surface access (in relation to an expanded Heathrow) is valuable in guiding the Applicant's own objectives: to ensure that access to the airport by road, rail and public transport is high quality, efficient and reliable for passengers, surface freight operators and airport workers who use transport on a daily basis. The Government also wishes to see the number of journeys made to airports by sustainable modes of transport maximised as much as possible. This should be delivered in a way that minimises congestion and environmental impacts.

2.1.5 *Beyond the horizon: The future of UK Aviation: Making Best Use of existing runways* (Ref 2.4) was published alongside the Airports National Policy Statement (Ref 2.3) in June 2018 and supports the principle that airports other than Heathrow should seek to make best use of their existing runways. The policy statement concludes that:

"*... 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. This policy statement does not prejudge the decision of those authorities who will be required to give proper consideration to such applications. It instead leaves it up to local, rather than national government, to consider each case on its merits.*"

2.1.6   The *Making Best Use of existing runways* policy (Ref 2.4) made clear that government expects there to be measures taken centrally by Government, in relation to the decarbonisation of air transport, that would be consistent with the planning presumption of airports seeking to make best use of their existing runway and that these would be set out in the anticipated new aviation strategy. The proposals are covered by Flightpath to the Future and the new Jet Zero Strategy (see below). The policy indicates that, as part of any planning application, airports will, nonetheless, need to demonstrate how they will mitigate against local environmental issues, taking account of relevant national policies, including any new environmental policies emerging from the anticipated new Aviation Strategy.

2.1.7   The DfT's *Transport Decarbonisation Plan* (Ref 2.5) sets out the Government's commitments and the actions needed to decarbonise the UK's entire transport system. The plan sets out eleven commitments to accelerate aviation decarbonisation in the UK, including to "...consult on a target for decarbonising emissions from airport operations in England by 2040". The plan sets out how modal shift to public and active transport will be accelerated, and how non-zero emission road vehicles will be phased out over time.

2.1.8   DfT's *Jet Zero Strategy* (Ref 2.6) sets out how the Government will achieve net zero aviation by 2050. It focuses on the rapid development of technologies in a way that maintains the benefits of air travel whilst maximising the opportunities that decarbonisation can bring to the UK. One of the three strategic objectives is for consumers to have access to sustainable modes of transport to and from airports in England. DfT states that it will work with airports, other Government departments, local authorities, and other interested bodies to help airports in England improve their surface access through developing Master Plans and Surface Access Strategies. DfT want to ensure that the right policies are in place to encourage passengers and staff to travel on sustainable modes of transport to and from the airport where possible.

2.1.9   DfT's *Flightpath to the Future* (Ref 2.7) is a strategic framework that focuses on providing clarity on the key priorities for the sector and how the Government and industry will work together to deliver them. One of the ten point plans for delivery focuses on unlocking local benefits and levelling up. This point includes recognition that airports are increasingly becoming regional transport hubs, supporting multiple businesses, labour markets, and population centres. Therefore, reliable and efficient surface access connections are an important part of achieving this. Airports are expected, through their surface access strategies, to set targets for sustainable passenger and staff travel to and from the airport.

2.1.10   The Government recognises that different targets and proposals for meeting targets will be appropriate for different areas. It is advised that this list is therefore not prescriptive or exhaustive.

2.1.11   Local and regional policies and transport strategies have also been considered where relevant, with further details provided in the **Transport Assessment [TR020001/APP/7.02]**.

2.2 ASAS documents to date

2.2.1 The first ASAS for the airport was produced by London Luton Airport Operations Limited (the current operator) in July 2000. The operator has renewed and updated the ASAS since that time, with the latest version (2018-2022) reissued in 2019 (Ref 2.8). The current ASAS contains objectives, targets, key performance indicators (KPIs) and action plans for surface access. It also explains how monitoring of progress in meeting targets will be carried out.

2.2.2 The current ASAS's (2018-2022) objectives are as follows:

a. Objective 1: To promote and encourage sustainable transport options for staff and passengers; and

b. Objective 2: To reduce the impact of surface access to the airport on the local community.

2.2.3 This SAS, which supports Luton Rising's application for development consent, presents a longer-term vision than the airport operator's ASAS. This is important for a number of reasons:

a. The expansion of the airport will take place over a long period of time, and it is important that there is a clear vision for surface access that guides and shapes the Proposed Development.

b. There are major changes occurring in the transport industry, with a rapid transition towards a zero-emission vehicle fleet taking place over the next two decades. The Applicant wants to support this transition to take place as quickly as possible at the airport which requires a longer-term view.

c. Achieving major changes in travel behaviour, for example, an increase in the proportion of passengers and staff using public transport to access the airport by Luton DART (and other means) will take place over a longer period of time.
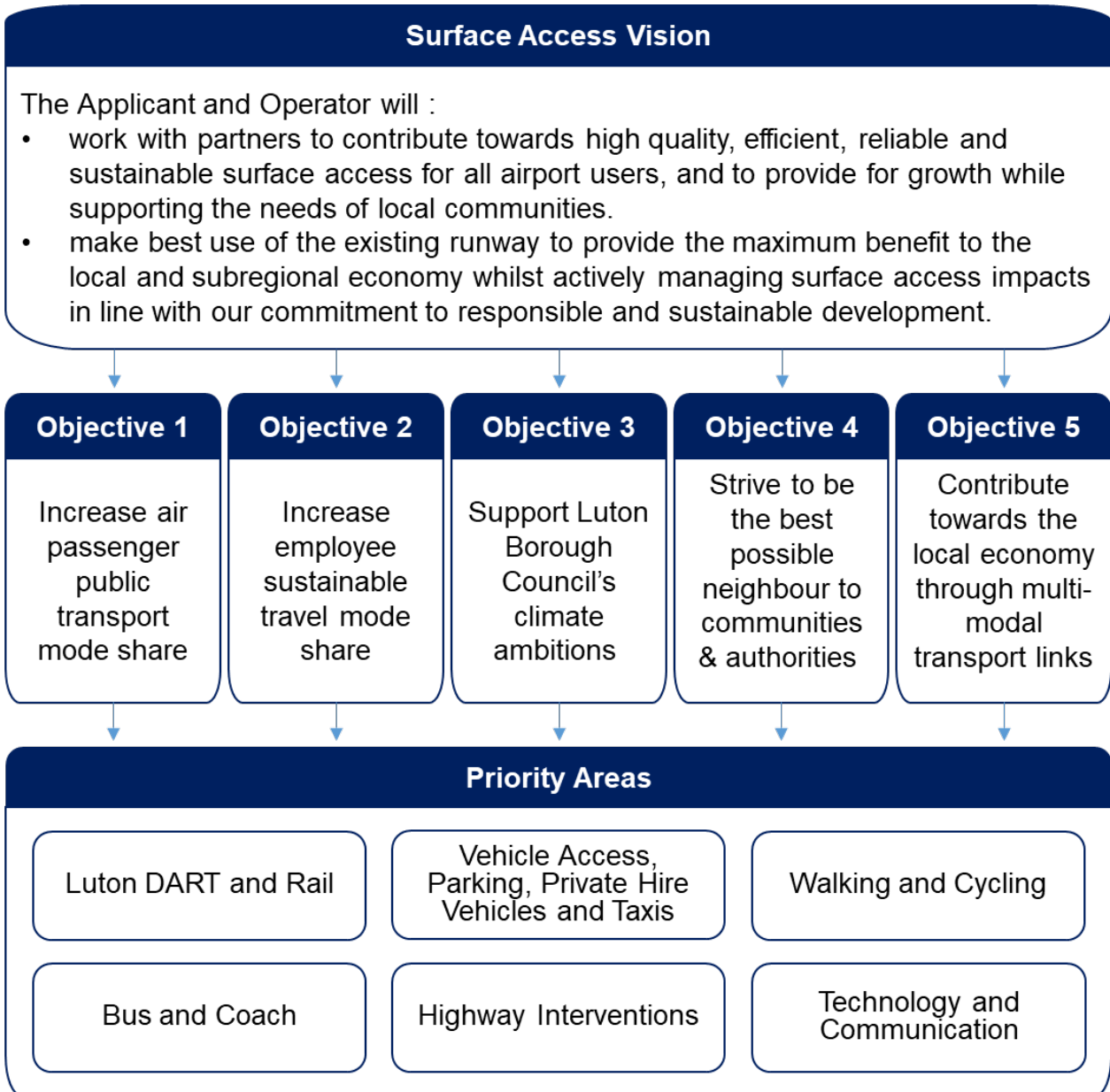
2.2.4 The future TPs will serve the role currently performed by ASASs and will take the recommendations set out in the *Aviation Policy Framework* (Ref 1.1) to set the future structure and contents for ASASs and this will be covered by the future TPs.

3 SURFACE ACCESS AT THE AIRPORT: 20-YEAR VISION

3.1.1 The Applicant is committed to improving accessibility to the airport, particularly by public transport and making the maximum use of the new Luton DART system that opens in 2023. The Luton DART will replace the existing shuttle bus between the airport and Luton Airport Parkway station and transform connectivity to the airport by rail for both passengers and staff. It will reduce journey times, transform the quality of travel experience, and improve reliability.

3.1.2 The Applicant has seen from other airports that have introduced a new fixed link rail connection the impact this can have on sustainable mode share and travel behaviour. For example, when London City Airport replaced its shuttle bus connection with a direct Docklands Light Railway (DLR) link in 2005, it attracted significant increase in public transport use (Ref 3.1).

3.1.3 By maximising the use of the new rail connections at the airport reliance on accessing the airport by road, particularly private car will reduce. This will help reduce the impacts of the airport on congestion, total airport-related GHG emissions and air pollution.

3.1.4 The Applicant also recognises that enhanced and sustainable accessibility is a key element to attracting more airlines and passengers to Luton that will support delivery of economic benefits to the area, and to the UK's position in the global economy. Improving accessibility to the airport, particularly by public transport and through maximising use of the Luton DART, will help enhance the catchment of the airport and make it a more attractive airport for airlines to serve.

3.1.5 The Applicant's surface access vision and objectives are shown in Figure 3.1: The Surface Access Strategy's vision, objectives and priority areas, and the priority areas positioned beneath them. There are multiple interventions associated with the priority areas, which comprise the Applicant's surface access toolbox. This longlist is contained in the **FTP [TR020001/APP/7.13]**. The vision and objectives of this SAS have been identified to align with the airport's *Vision for Sustainable Growth 2020-2050* (Ref 3.2) and capture the surface access Limits and Targets that underpin this strategy.

3.1.6 The role of the operator will vary across the interventions, and in some cases will change across different stages of delivery. Additionally, the 'toolbox' approach that underpins this strategy means that the Applicant's role, or the roles of the Applicant's partners and other stakeholders, may need to evolve to meet the changing needs of passengers and colleagues, or to continue progress against the Targets.

3.1.7 The vision and objectives also reflect the ongoing importance of the airport as a regional transport hub that connects people and businesses across Europe, and therefore provides a range of socio-economic benefits to Luton, the Three Counties (Bedfordshire, Buckinghamshire and Hertfordshire), as well as the wider region and nationally. As the airport delivers significant socio-economic benefits, the Applicant also recognises that without considered management and intervention, surface access can result in effects that impact local

communities and environment. This SAS seeks to address those issues to ensure they do not go unmanaged and unaddressed.

Figure 3.1: The Surface Access Strategy's vision, objectives and priority areas

Surface Access Vision

The Applicant and Operator will :
- work with partners to contribute towards high quality, efficient, reliable and sustainable surface access for all airport users, and to provide for growth while supporting the needs of local communities.
- make best use of the existing runway to provide the maximum benefit to the local and subregional economy whilst actively managing surface access impacts in line with our commitment to responsible and sustainable development.

Objective 1	Objective 2	Objective 3	Objective 4	Objective 5
Increase air passenger public transport mode share	Increase employee sustainable travel mode share	Support Luton Borough Council's climate ambitions	Strive to be the best possible neighbour to communities & authorities	Contribute towards the local economy through multi-modal transport links

Priority Areas

Luton DART and Rail	Vehicle Access, Parking, Private Hire Vehicles and Taxis	Walking and Cycling
Bus and Coach	Highway Interventions	Technology and Communication

3.1.8   The remainder of this document explains how the vision, objectives and priority areas set out above will be realised.

4 SURFACE ACCESS TODAY

4.1 Passenger surface access at the airport

4.1.1 The term 'passengers' in the context of surface access refers to air passengers travelling to or from the airport by surface transport. It does not include transfer passengers connecting flights through the airport so not travelling beyond the airport.

4.1.2 The Civil Aviation Authority (CAA) undertakes continual monitoring of the characteristics of passenger usage at the main UK airports through surveys of departing passengers. Between 2016 and 2019, a reduction in the proportion of airport passengers travelling to the airport by private car and taxi was recorded, with a corresponding increase in public transport use. This trend is shown in Figure 4.1, which summarises the yearly CAA data for passenger modes alongside the growth in mppa from 2010 up to 2019.

Figure 4.1: Passenger mode share between 2010 – 2019 and million passengers per annum (CAA data for Luton Sample size c.10k, final mode and annual passenger volumes)[2] [3]

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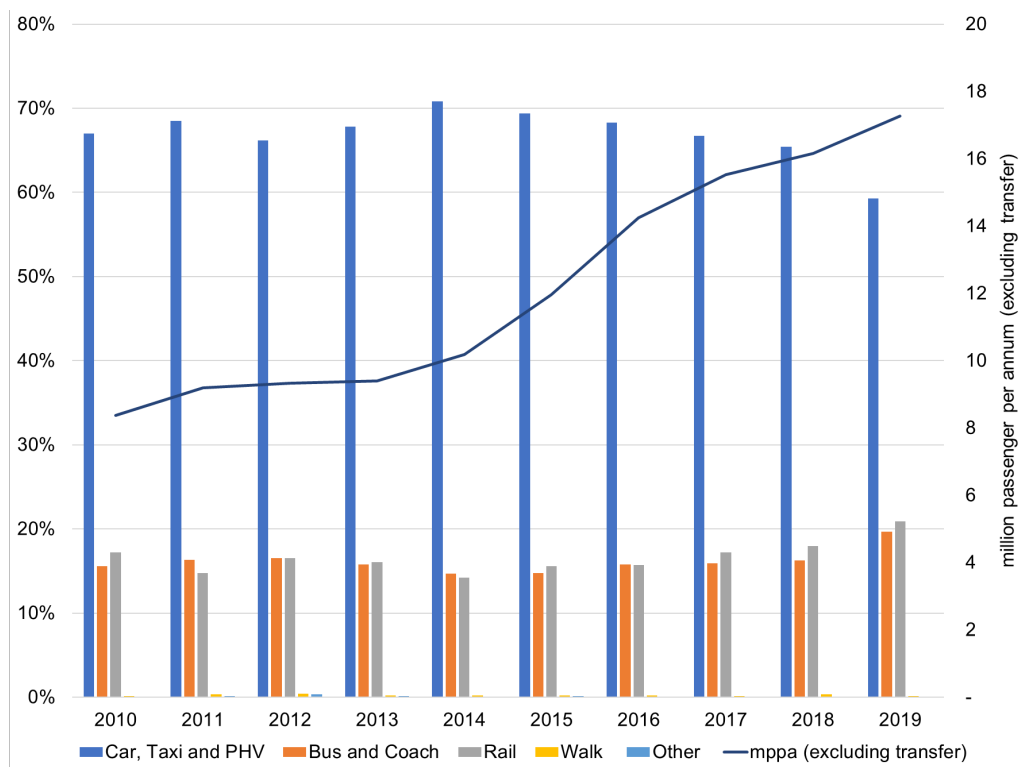
[2] The term 'private hire vehicles' (PHVs) refers to a wide range of licensed vehicles including minicabs, chauffeur and executive cars and limousines that requires a person to use a smartphone app, website or telephone booking to book a ride in advance, usually in a privately owned vehicle. Addison Lee, Uber and Bolt are examples of PHV providers. Taxis, also known as black cabs or hackney carriages, do not require bookings and can be hailed on-street.

[3] The Transport Assessment [TR020001/APP/7.02] sets out the approach to how mode share assumptions have been set (Chapter 6) and provides commentary on various sources of mode share data that have been quoted for the airport (Chapter 9).

4.1.3   The increase in public transport use for airport passengers has been largely attributed to an increase in rail passengers but there has also been a small increase in bus and coach use for passengers accessing the airport. These changes have occurred as a result of a number of measures and changes at the airport including the promotion of rail options.

4.2   Staff surface access at Luton Airport

4.2.1   More than 40 companies have operations that are related to the airport's on-site activities. A large number of businesses are based in Luton due to the presence of the airport, including those within and around the airport boundary. The total number of staff has fluctuated over recent years as a result of the impacts of Covid-19 travel restrictions on airport operations.
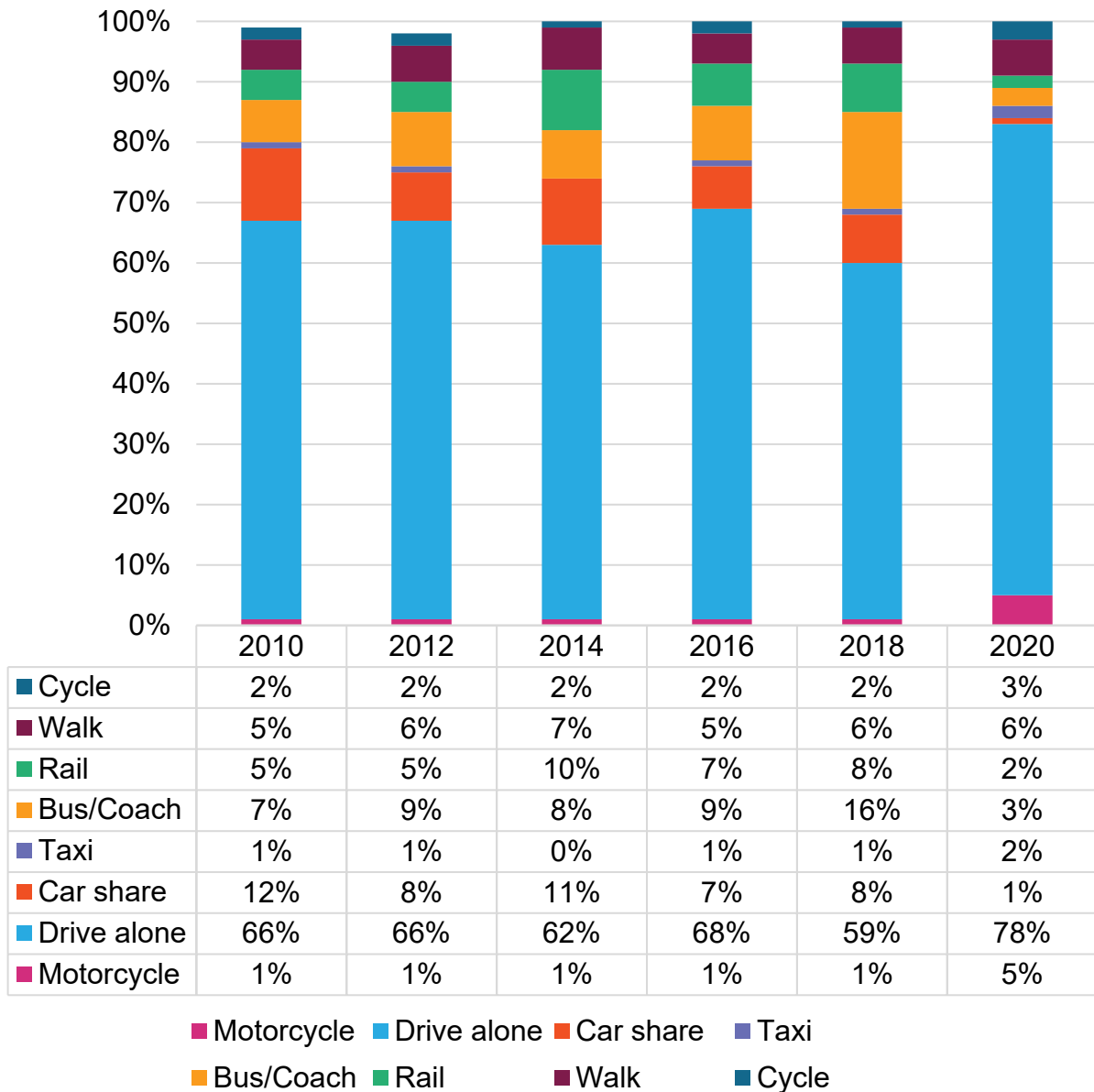
4.2.2   The focus of this strategy is on staff that have roles related to on-site activities, however there are some companies that employ staff that do not have a direct relationship with operations and are therefore not airport passholders. An example of this is easyJet, as its head office and academy training centre are located at the airport.

4.2.3   Figure 4.2 shows the trends in staff surface access mode share since 2010, showing the results of the two-yearly staff survey. Private car (drive alone and car share) mode share has generally decreased between 2010 to 2018, with a major shift towards bus/coach, from 7% in 2010 to 16% in 2018. During Covid-19 travel restrictions, the Applicant temporarily relocated staff car parking closer to the terminal, allowing staff to walk to work from the car park rather than needing another shuttle, enabling social distancing. This, alongside other changes in travel behaviour, would have contributed towards the high 'drive alone' mode share observed in 2020, noting that overall staff numbers were much reduced on account of the significantly lower passenger throughput.

4.2.4   The term "car sharing" refers to two or more people travel together by car for all or part of a trip. Car sharing may be formal, using an organised car share scheme, or informal, for example, friends or colleagues travelling to/from work together.

4.2.5   Whilst previous surveys have considered car sharing as a private car trip for both the passenger and driver, going forward, the Applicant and operator will consider the passenger in a car share as a sustainable trip.

Figure 4.2: Trends in staff surface access modal share, rounded (Staff surveys, LLA *Annual Monitoring Report* 2021) (Ref 4.1)

	2010	2012	2014	2016	2018	2020
■ Cycle	2%	2%	2%	2%	2%	3%
■ Walk	5%	6%	7%	5%	6%	6%
■ Rail	5%	5%	10%	7%	8%	2%
■ Bus/Coach	7%	9%	8%	9%	16%	3%
■ Taxi	1%	1%	0%	1%	1%	2%
■ Car share	12%	8%	11%	7%	8%	1%
■ Drive alone	66%	66%	62%	68%	59%	78%
■ Motorcycle	1%	1%	1%	1%	1%	5%

■ Motorcycle ■ Drive alone ■ Car share ■ Taxi
■ Bus/Coach ■ Rail ■ Walk ■ Cycle

4.3 Luton Airport's ongoing surface access improvements

4.3.1 The Applicant and operator are committed to providing and supporting high quality, efficient, reliable and sustainable surface access. Table 4.1 presents the airport's existing and committed transport interventions, which demonstrate an ongoing commitment to mode choice and ease of access. This shows a rapidly improving picture of accessibility to the airport by public transport, underpinned by the opening of Luton DART in 2023.

Table 4.1: Luton Airport's ongoing surface access improvements

Improvement	Description
Luton DART	Once operational in 2023, Luton DART will be a fully-automated transport system to move passengers between Luton Airport Parkway station and the existing airport terminal. Service provision up to every 4 minutes will contribute towards a more seamless, high quality and reliable rail journey. Total journey time from London St Pancras will reduce to just over 30 minutes, competitive with other airports serving the London aviation market where public transport use is higher. The Luton DART will replace the existing bus transfer arrangements and support wider modal shift for both passengers and staff reducing congestion and its impacts on local communities.
East Midlands Rail Services	Abellio, as part of the East Midlands franchise, has increased services between the airport with two direct services an hour. Abellio is delivering improvements to both Luton Airport Parkway and London St Pancras stations to provide improved passenger information and passenger experience.
Thameslink	Thameslink now operates up to 8 services per hour as a result of improvements since 2019 including half hourly direct services to Brighton and Rainham in Kent via south east London. Services are now operated by new air condition rolling stock with capacity for over 1,000 passengers per train.
East West Rail (EWR)	The EWR programme is an opportunity for improved east-west connections. The proposed rail link will connect Oxford and Cambridge, as well as other places within the Oxford-Cambridge Arc, including Bicester, Bletchley, Milton Keynes and Bedford. The proposed route will join up with existing north-south rail lines, including the Thameslink route at Bedford, connecting into Luton Airport Parkway station.
Drop-off access charging	The closest terminal drop-off area costs users £5 for 10 minutes and £1 per minute thereafter, discouraging drop-off and encouraging motorists to use car parks and alternative modes. Discounts are also available for fully Electric Vehicles.
Travel Planning measures	The airport has initiatives for staff travel, including liftshare.com accounts (currently suspended), significant discounts for local buses, rail travel and National Express coaches and a Cycle to Work scheme (paused).
Electric Vehicle Charging	The airport has installed six Tesla Superchargers, and four type 2 charging points available to the public within its car parks with low cost recharging for electric vehicles for up to 30 minutes.

5 SURFACE ACCESS LIMITS AND TARGETS

5.1 Overview

5.1.1 A distinction is made in this SAS between surface access Limits and Targets. The difference between the two is summarised in Table 5.1, with further details in the sections that follow.

Table 5.1: GCG surface access mode share Limits and Targets

| Distinction	Limits	Targets
Set out in	**GCG Framework [TR020001/APP/7.08]**	**FTP [TR020001/APP/7.13]** specifies these are to be set out in five-yearly TPs
Securing mechanism	Compliance with GCG Framework secured through the DCO	Production of TPs is a Requirement of the FTP (secured through the DCO)
Scope	Three Limits covering passenger and staff mode share, and GHG emissions only	Additional more granular Targets required beyond the three Limits
Basis	'Reasonable worst-case' not to be exceeded, to ensure environmental effects are no worse forecast at point of DCO	More ambitious than Limits, aligned to delivery of wider surface access Vision and Objections
Consequence	Growth can be stopped if Limits are breached	Growth will not be stopped, but additional interventions to be implemented in relevant priority areas if Targets not achieved
Timeframe	Set at point of DCO and linked to passenger throughput (not time), corresponding with assessment phases of the ES	Targets reviewed and updated within lifespan of each subsequent five-yearly TP

5.2 GCG Mode Share Limits

5.2.1 GCG is an innovative new framework that has been developed since the 2019 statutory consultation took place to address the feedback received on environmental concerns, and the strong desire indicated by stakeholders for the airport to be more ambitious in its approach to reducing and mitigating the environmental effects of expansion. GCG focuses on four key environmental topics; aircraft noise, air quality, GHG emissions and surface access.

5.2.2 The legally-binding GCG Framework **[TR020001/APP/7.08]** contains a series of clearly specified 'Limits' for the environmental effects of the expanding, expanded, and lifetime operation of the airport. By enshrining these Limits within the DCO, the GCG Framework ensures that the actual effects of the Proposed Development, as they manifest over time, are monitored and timely measures are taken to ensure that those Limits are not exceeded.

5.2.3   Sitting below each Limit, there will be two Thresholds; a Level 1 Threshold and a Level 2 Threshold. Similar to any potential exceedances of a Limit, there are separate processes to be followed by the airport operator as each Threshold is reached. This is a proactive approach with the aim of ensuring as far as possible that as the airport grows, environmental Limits will be respected. The approach to Limits and Thresholds is summarised in Figure 5.1.

5.2.4   The magnitude of each Limit (and in turn, Threshold) is aligned with the assessment results from the Environmental Impact Assessment (EIA) and reported in the **TA [TR020001/APP/7.02]** and **ES [TR020001/APP/5.01]**, which change over time in line with phasing. In this way, the **GCG Framework [TR020001/APP/7.08]** serves to ensure that the 'reasonable worst case' environmental effects are not exceeded. If they were to be exceeded, growth at the airport would have to stop, and mitigation would be implemented in accordance with the processes mandated by the GCG Framework.

5.2.5   The assessment of performance against the Limits for the four environmental areas, including surface access, will be undertaken annually, with defined monitoring and reporting requirements set out as part of the framework and secured through the DCO. To oversee the GCG Framework, a new, independent body known as the Environmental Scrutiny Group (ESG) will be established. As the airport grows, environmental monitoring will be undertaken and submitted annually to the ESG, via a series of topic-specific Technical Panels. Both the ESG and Technical Panels will include representatives of local authorities and independent technical specialists.

5.2.6   The key elements of the legally binding GCG Framework are therefore:

    a. Limits on environmental effects in four key areas;

    b. A series of processes to be followed as environmental effects reach Thresholds defined below these Limits;

    c. Ongoing monitoring of the actual environmental effects of expansion and operations at the airport;

    d. Independent oversight of environmental effects associated with the operation of the airport; and

    e. An explicit commitment to link environmental performance to growth at the airport.

Figure 5.1: Approach to Limits and Thresholds in the GCG Framework
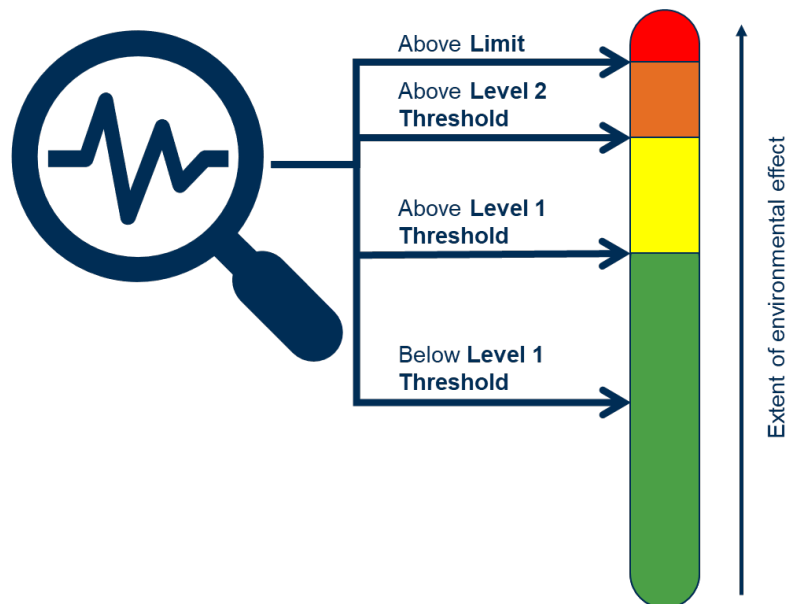
5.2.7 The GCG Limits are set to align with different points in the airport's expansion, consistent with the assessment phases of the **ES [TR020001/APP/5.01]**. GCG would only apply to any growth that occurs at the airport beyond the consented baseline position (i.e. the current 18 mppa passenger cap, or the proposed 19 mppa passenger cap, pending the outcome of the planning inquiry). The Level 1 Thresholds, Level 2 Thresholds and the Limits therefore correspond to:

a. Phase 1 – From the point at which notice under Article 44(1) of the **Draft DCO [TR020001/APP/2.01]** is served, to the point at which commercial passenger throughput reaches 21.5 mppa, consistent with the assessment of Phase 1 in the EIA;

b. Phase 2a – From the end of Phase 1 to the point at which commercial passenger throughput reaches 27 mppa, consistent with the assessment of Phase 2a in the EIA;

c. Phase 2b – From the end of Phase 2a to the point at which commercial passenger throughput of 31.5 mppa is reached; and

d. Full Capacity Operation – From the end of Phase 2b on an ongoing basis.

5.2.8 The surface access element of GCG contains two mode share Limits, shown in Table 5.2, to control the percentage mode share of passengers and staff travelling by 'non-sustainable' modes. Non-sustainable modes in the context of GCG include travel by car, taxi, minicab and motorcycle.

5.2.9 These Limits therefore function to promote the uptake of 'sustainable' travel, including public transport and active travel. Specifically for the staff mode share Limit only, sustainable trips also include car sharing (counting the passenger only), and trips avoided entirely by staff working from home. Further details on the definitions and alignment with modes of transport recorded through the CAA Departing Passenger Survey data are provided in Appendix F Surface Access Monitoring Plan of the **GCG Framework [TR020001/APP/7.08]**.

Table 5.2: GCG surface access mode share Limits

Limit	Limit Values			
	Phase 1	**Phase 2a**	**Phase 2b**	**Full Operating Capacity**
Air passenger non-sustainable travel mode share	**Limit**			
	62%	60%	55%	55%
	Level 2 Threshold			
	60%	58%	53%	53%
	Level 1 Threshold			
	58%	56%	51%	51%
Airport staff non-sustainable travel mode share	**Limit**			
	70%	68%	64%	60%
	Level 2 Threshold			
	69%	66%	62%	58%
	Level 1 Threshold			
	67%	64%	61%	56%
Note: all Limit and Threshold values have been rounded to zero decimal places				

5.2.10   In addition to the two mode share Limits set out in Table 5.2, the **GCG Framework [TR020001/APP/7.08]** also includes a surface access GHG emissions Limit, based on the net total of GHG emissions (which is inclusive of offsetting). The GHG emissions Limit has been aligned with Luton Rising's commitment made through its *Net Zero Strategy* (Ref 1.2) to be carbon neutral for surface access by 2040.

5.2.11   The **GCG Framework [TR020001/APP/7.08]** will be legally secured through the DCO, whilst the **GCG Framework Explanatory Note [TR020001/APP/7.07]** provides further detail on the development of GCG and justification for the approach taken, in support of the application for development consent.

5.3   Travel Plan Targets

5.3.1   Through the future TPs, the operator will identify, monitor and report on a multiple surface access Targets approved by the Applicant. The two headline Targets comprise passenger and staff mode share, consistent with the surface access-related GCG Limits:

a. Non-sustainable modes passenger travel mode share (% of passengers using non-sustainable travel modes of all passengers travelling to and from the airport); and

b. Non-sustainable staff travel mode share (% of staff using non-sustainable travel modes of all staff travelling to and from the airport).

5.3.2   However, these Targets will be set lower than the corresponding Limits, to provide an additional level of ambition as the airport grows.

5.3.3   The operator will also set Targets for other surface access-related indicators. The diversification of Targets will allow for the collection, analysis and ongoing review of more granular data and an improved understanding of how interventions and measures are performing.

5.3.4   As shown previously, baseline data for passenger and staff travel has been subject to considerable variation over recent survey years. Therefore, Targets will be set with the latest CAA air passenger travel data and once the first staff survey has been completed post the application be granted consent.

5.3.5   The **FTP [TR020001/APP/7.13]** sets out how Targets will be set within the first future TP. The scope of Targets may be revisited when developing the first TP post-consent to best reflect the latest survey results.

6 PRIORITY AREAS

6.1.1 A key part of the development of the proposals for this SAS has been the identification of priority areas and supporting interventions to influence how passengers and staff travel to and from the airport. Increasing access to the airport by sustainable modes of transport will limit the increase in road traffic and impacts on the surrounding area, as well as avoid and reduce the potential environmental impacts of the Proposed Development.

6.1.2 Whilst the Applicant's plans for the Proposed Development and assessment of its impacts have been developed on the basis of forecasting, in line with relevant guidance and using the best available data, it is inevitable that the future will bring changes which cannot currently be foreseen with certainty. The Covid-19 pandemic and its effects on air travel demand and transport mode choice is a clear, recent example. In this context, it is vital to be prepared with a variety of responses which are adaptable and can be used to enable the airport to remain within the GCG Limits and achieve the Applicant's surface access Targets in the context of an inherently uncertain future.

6.1.3 This SAS sets out the toolbox and the Applicant's approach to ensuring sustainable expansion. The interventions are grouped under six priority areas. The priority areas are detailed in this section, with the longlist of interventions that form the toolbox contained in the **FTP [TR020001/APP/7.13]**. Future TPs identify tools from the toolbox to achieve the vision, objectives, Limits and Targets.

6.1.4 The toolbox consists of interventions and measures that the operator can draw upon and scale up or down as and when required. The toolbox would be deployed flexibly to respond to changing circumstances and the results of ongoing monitoring and stakeholder feedback and achieve Limits and Targets.

6.1.5 Some interventions, particularly where they have significant infrastructure requirements associated with them, will have to be implemented at a particular time or in accordance with a wider programme. Others will be brought forward or delivered by others with support of the airport operator. These interventions include maximising the opportunities presented by the delivery of third-party schemes which the Applicant supports, but has no direct control over their delivery, such as EWR.

6.1.6 The interventions and measures are grouped by six priority areas, which comprise:

    a. Luton DART and Rail;

    b. Vehicle Access, Parking, Private Hire Vehicles and Taxis;

    c. Bus and Coach;

    d. Walking and Cycling;

    e. Highway Interventions; and

    f. Technology and Communications.

6.1.7   This section outlines each of the six priority areas and the key theme(s) that will guide the interventions.

6.2   Luton DART and Rail

6.2.1   The primary theme for this priority area is to maximise opportunities to connect with existing and planned rail infrastructure.

6.2.2   The Luton DART will open in 2023 and directly connect the existing airport terminal by rail for the first time. Making the maximum use of the Luton DART network is a key priority of this SAS to ensure as many passengers and staff use the new system as possible.

6.2.3   The Applicant will provide physical improvements to Luton DART that will help achieve the public transport modal share Targets, primarily the extension to Terminal 2. This extension will build on the current Luton DART scheme that is being delivered to serve Terminal 1 and will link both terminals to Luton Airport Parkway station.

6.2.4   Luton DART provides a unique opportunity to directly influence travel to the airport. The Applicant has control over the Luton DART service through their ownership of the rail connection, so can ensure that from the day of opening, it will provide the best possible customer experience and support people travelling between the airport and the national rail network.

6.2.5   The Applicant will seek to maximise opportunities to grow the number of passengers and staff accessing the airport using existing main line rail services calling at Luton Airport Parkway station, including Thameslink and East Midlands Rail. This includes opportunities to maximise the number of services calling at the station, integrated ticketing and joint marketing for rail-based travel.

6.2.6   In recent years, the airport and Luton generally have benefited significantly from the improvements to the Thameslink network, with more services operating from/to key London terminals. The opening of the Elizabeth line in 2022 has opened up more direct access to Thameslink via interchange at Farringdon. These improvements act to enhance the effectiveness of Luton DART and its catchment and coverage from opening.

6.2.7   The Applicant will monitor the usage data of Luton DART closely from opening and use this data to continually guide improved experience and patronage for passengers.

6.2.8   The **FTP [TR020001/APP/7.13]** contains the longlist of possible future interventions and measures associated with Luton DART and rail.

6.3   Vehicle Access, Parking, Private Hire Vehicles and Taxis

6.3.1   The two themes for this priority area are to:

a. Effectively manage and control onsite vehicle access and parking to incentivise sustainable mode and vehicle choices; and

b. Protect surrounding communities from potential negative impacts.

6.3.2   The Applicant wants to encourage as many passengers as possible to use public transport to access the airport.

6.3.3   A key component of this priority area is the management of vehicle demand and through the use of access and parking charges. To maximise the sustainability of surface travel to the airport, the operator will continue to set, vary, and enforce charges on vehicles accessing the airport forecourt areas and car parks.

6.3.4   The existing access charging regime is a means of influencing travel demand and mode choice by imposing financial charges on the use of vehicles in certain areas of the airport.

Table 6.1: Existing Access and Parking Charging at the airport

Option	Parking area	Transfer to terminal	Price
Free drop-off/pick up	Mid Stay Car Park	600m walk	Free for 15 minutes
Free parking	Long Stay Car Park	10 mins bus ride, with bus every 20 mins	Free for 1 hour £5.00 for 2 hours
Closest to terminal	Drop-off/ Pick-up zone	350m walk	£5.00 for 10 mins £1.00 per min thereafter
15 to 30 minutes	Mid Stay Car Park	600m walk	£4.00 for 30 mins

6.3.5   While there are numerous interventions and measures in the **FTP [TR020001/APP/7.13]** that will support the airport's sustainability aspirations, many of the most impactful (such as the delivery of additional public transport capacity) rely on the involvement and support of third parties. The existing access charging regime controlled by the operator is one of the principal levers fully within their control that can influence travel demand and can act to reinforce other measures brought forward through future TPs.

6.3.6   For many passengers, being dropped off at the airport by a friend or family member, or taking a taxi, is the most convenient way to travel. This arrangement doubles the number of trips when compared to passenger parking at airport car parks, where the passenger is making a single trip to the airport and another return journey later. This means that a passenger parking at the airport generates half the number of vehicle trips (2 one-way car trips) than a passenger being dropped off for departure and then picked up on their return (4 one-way car trips).

6.3.7   There are opportunities for taxi and private hire vehicles[4] to operate more efficiently than they do today. The operator will seek to investigate opportunities to introduce new measures which encourage more efficient use of taxi and private hire, ensuring where possible that vehicles are occupied in both directions where possible, thus reducing the number of empty vehicle trips coming in and out of the airport. These opportunities could include priority taxi queueing for full arrivals, taxis arriving with a passenger being given a preferential lane for re-ranking and further opportunities for a taxi sharing scheme.

6.3.8   The operator and Applicant will incentivise cleaner, greener vehicles. The Proposed Development includes EV charging points for cars using the airport car parks and the operator will be working with taxi and private hire operators to achieve an ambitious transition to zero emission vehicles serving the airport.

6.3.9   The operator recognises that commuter car sharing[5] is an effective way to encourage sustainable travel for staff without easy access to public transport or who live too far away to consider active travel opportunities. The operator will seek to improve the commuter car sharing platform to encourage greater use.

6.3.10   For road-based freight and servicing traffic (e.g. deliveries of retail goods, fuel, aircraft servicing, air cargo and removal of waste etc.), the operator will consider ways to improve monitoring of goods. Where opportunities arise, the operator will seek to work with road-based freight operators to introduce and lower emissions vehicles. This may include opportunities to consolidate airside and landside servicing movements.

6.3.11   The **FTP [TR020001/APP/7.13]** contains the longlist of possible future interventions and measures associated with vehicle access, parking, PHVs and taxis.

6.4   Bus and Coach

6.4.1   The two themes for this priority area are to:

   a. Improve local bus connections for passengers and staff to improve choice for people accessing the airport from surrounding areas by public transport; and

   b. Strengthen the coach offer at the airport with new routes, more frequent existing routes and a better interchange with other modes of transport.

6.4.2   The operator is already engaging with authorities and bus and coach operators such as Luton Borough Council (LBC), Central Bedfordshire Council (CBC), Hertfordshire County Council (HCC), National Express and Arriva on the current

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[4] The term 'private hire vehicles' (PHVs) refers to a wide range of licensed vehicles including minicabs, chauffeur and executive cars and limousines that requires a person to use a smartphone app, website or telephone booking to arrange a ride in advance, usually in a privately owned vehicle. Addison Lee, Uber and Bolt are examples of PHV providers. Only taxis, also known as black cabs or hackney carriages, can be hailed without a prior booking.
[5] Car Sharing in this instance means more than one person sharing a private car trip together which results in a reduction from two (or more) car trips to one.

level of service of bus and coach services to the airport through various forums, which will continue through the Airport Transport Forum (ATF).

6.4.3   In recent years, up to 2020, there was an increase in the use of bus and coach for accessing the airport by both staff and passengers. The operator will seek to continue to engage with bus operators to grow both the coverage and frequency of services that call at the airport. This includes local bus services aimed primarily at staff and longer distance coach services, particularly those routes serving areas where rail is a less viable option, including east-west services.

6.4.4   There is the potential to significantly increase the use of coaches for travel to and from the airport, even from areas that coaches currently serve.

6.4.5   A lack of bus accessibility during the night has an impact on staff accessing the airport for shifts outside of standard AM peak arrival (6am-9am) and PM peak departure (4pm-7pm) highway timeframes. As such, the initial focus of the future TP is on extending the operating hours of local bus services to help staff travel by sustainable modes. The operator will identify opportunities to work with bus operators to provide staff-only express bus services or on-demand services that align better with airport shift patterns.

6.4.6   The Proposed Development will enhance public transport infrastructure at the airport with increased bus and coach capacity proposed at Terminal 1 and new facilities at Terminal 2 that separate coach and bus activities. The Proposed Development will deliver almost triple the existing bus and coach capacity at the airport.

6.4.7   In 2019, Transport Focus published a joint research study with the DfT and Heathrow Airport (Ref 6.1) to understand the decision making and behavioural choices of both coach users and non-users, to understand what practical steps can be undertaken to grow usage of coach as a surface access mode. The nationwide study included analysis of non-Heathrow users (including Luton) from key catchment areas as well as coach usage to other airports in the UK.

6.4.8   The study found that the awareness of coach as an option for getting to airports is often low, and initiatives to increase coach usage must first address the negative views people have of coach travel. However, the research highlighted that people travelling by coach for the first time generally have a positive experience, with repeated usage.

6.4.9   The Applicant recognises that persuading more people to access the airport by coach will require a joined-up proposal with coach operators and airlines. The **FTP [TR020001/APP/7.13]** outlines how the Applicant will promote awareness and improve the user experience for coach users to start to grow mode share, with a focus on attracting new passengers.

6.4.10   The **FTP [TR020001/APP/7.13]** contains the longlist of possible future interventions and measures associated with bus and coach travel.

6.5   Walking and Cycling

6.5.1   The theme of this priority area is to make walking and cycling an attractive and viable choice for more staff. Whilst the scope for passenger trips to be made on

foot or by bicycle is limited, there is scope for walking and cycling to play a much more significant role for staff travel in future.

6.5.2   The airport is unique in that there is a residential catchment within relatively easy walking distance of the airport. In 2019, 6% of staff walked to work at the airport, demonstrating how close some staff live to their place of work. In comparison, cycling accounted for just 2% of staff trips in 2019. Retaining and growing walking mode share and increasing cycle mode share is a priority of the SAS for staff trips.

6.5.3   To achieve this, the Applicant will improve access to the airport on foot and bicycle from the surrounding area through a range of interventions and contributions. This could include improvements to walking and cycling infrastructure, including the potential for dedicated cycling routes into the airport from surrounding neighbourhoods of Luton, working with LBC. The topography of the areas connecting Luton town and the airport could be addressed by exploring the increasing popularity of power-assisted e-cycles (and other potential micro-mobility solutions subject to upcoming legislative changes) and provision of required recharging infrastructure.

6.5.4   The Applicant and operator will look to provide improved onsite facilities to support cycling, including more secure cycle parking and supporting end of trip facilities such as showers and lockers. As part of the future TP, the operator will look to work with employers to improve facilities and explore financial grants and incentives to help staff access subsidised cycles.

6.5.5   The **FTP [TR020001/APP/7.13]** contains the longlist of possible future interventions and measures associated with walking and cycling.

6.6   Highway Interventions

6.6.1   To accommodate growth of the airport, some improvements to the highway network are required to support surface access, which have been identified though detailed modelling. These improvements will be delivered over the duration of this strategy. The Airport Access Road, which provides access to the new terminal, is the largest single highway scheme within the Proposed Development.

6.6.2   Information about the potential changes to the use and performance of the road network as a result of the Proposed Development is provided in the TA **[TR020001/APP/7.02]**, as well as consideration of the proportion of airport-related traffic on the wider highway network. The TA also lists the improvement schemes to mitigate impacts on the highway network. The TA sets out the identified junction improvements on the surrounding highway network to mitigate the impact of the Proposed Development. The majority of the improvement schemes are located within the local Luton area, with three additional schemes identified in Hitchin.

6.6.3   The Applicant has and will continue to work with the local highway authorities to ensure the design of these interventions meets local needs and wherever possible incorporates improvements to active travel modes and additional landscaping.

6.6.4 The **TA [TR020001/APP/7.02]** includes the Outline TRIMMA in Appendix I. It sets out how future monitoring of surface access to the airport will be undertaken and sets out the assessment of highway impacts and how mitigation will be provided. Further details on this and its interface with the other surface access monitoring regimes is set out in Section 7.4.

6.7 Technology and Communications

6.7.1 The Applicant and operator will seek to use the best available technology and digital solutions to support the delivery of the objectives set out in this SAS. This includes rapid deployment of zero emission vehicle technologies that can help reduce carbon emissions from transport for vehicles operating on the airfield and in and around the airport. This includes delivering the technology required to support a reduction in carbon emissions from passenger and staff vehicles.

6.7.2 The Applicant and operator will work with partners to consider the role of emerging transport technologies and how they can help deliver the objectives of the SAS, including autonomous vehicles. The Applicant also recognises the role that data and digital technology can play in influencing travel behaviour, for example, by giving passengers access to the best possible information on public transport options and fully integrating Luton DART into a seamless rail journey.

6.7.3 The Applicant's surface access monitoring methods will also benefit from improved data collection techniques and data quality associated with the Automatic Number Plate Recognition (ANPR) which may be used to enhance the Full Transport Related Impacts Monitoring and Mitigation Approach (Full TRIMMA).

6.7.4 Alongside technology, improved communication of surface access travel options is vital for both passengers and staff. As mentioned previously, a recent study showed that there is low awareness of coach as a travel option to UK airports, with additional analysis noting that awareness of coach needs to be raised outside of normal customer touchpoints, since many of the target audience are not researching different modes.

6.7.5 The results from the staff travel survey conducted in 2019, the last year the question was asked, showed that fewer than half of surveyed staff were aware of the Cycle-to-Work (46%) and Car Sharing (22%) schemes available to staff. Whilst some interventions and measures were suspended during Covid-19 restrictions, recommencement of schemes, and their benefits to the staff, will be communicated in a targeted way that maximises awareness and uptake.

6.7.6 The **FTP [TR020001/APP/7.13]** contains the longlist of possible future interventions and measures associated with technology and communications.

7 DELIVERY AND MONITORING

7.1 Monitoring approach

7.1.1 The purpose of the operator's monitoring approach is to ensure that future growth at the airport takes place within the clearly defined GCG Limits as air passenger capacity increases, and progress towards the more ambitious Targets is measured over time. The **FTP [TR020001/APP/7.13]** establishes the monitoring approach, methodology and reporting mechanisms that will support ongoing review of Limits and Targets and ensure that sustainable mode shares are achieved.

7.1.2 The objectives for developing a comprehensive monitoring approach are to enable:

a. Effective tracking of progress towards improving sustainable access for passengers and staff to access the airport;

b. Identification of impacts on surrounding communities, the surrounding road network and public transport networks;

c. Understanding of any impact that may require traffic management measures to be adjusted including access / parking charges;

d. Assessment of mode specific data collected aligns and supports the annual staff surveys collected by the airport; and

e. Contributions towards a greener airport.

7.1.3 There are three monitoring frameworks in association with surface access:

a. GCG Monitoring;

b. TP Monitoring, to be developed in the first five-yearly TP post-consent; and

c. TA Monitoring and the TRIMMA.

7.1.4 These monitoring frameworks each have their own specific requirements linked to their different purposes, which are summarised in the sections that follow. More details on the approach are contained in the Outline TRIMMA, Appendix I to the **TA [TR020001/APP/7.02]**.

7.2 Green Controlled Growth

7.2.1 The assessment of performance against the mode share Limits will be undertaken annually, with defined monitoring and reporting requirements set out as part of the **GCG Framework [TR020001/APP/7.08]** and secured through the DCO. The GCG Framework includes a Surface Access Monitoring Plan (Appendix F), setting out these requirements. GCG is not intended to manage day-to-day issues at the airport; rather it considers the changes in overall environmental effects (including surface access) as the airport grows over time, to ensure the 'reasonable worst case' assessment in the EIA is not exceeded.

7.2.2 Where monitoring has shown that a Limit has been exceeded, the airport will not be able to continue growing until a specific series of steps have been followed, as defined by the Framework. Compliance with each of these steps

will be secured through the DCO, and enforcement action could be taken if growth at the airport continued in contravention to the GCG Framework, as explained in the accompanying **GCG Framework Explanatory Note [TR020001/APP/7.07]**.

7.3 Framework Travel Plan

7.3.1 As part of the existing *ASAS* (2018–2022) (Ref 2.8) process, staff travel surveys are typically conducted every two years. This has formed the primary source of information on staff travel behaviour, awareness of interventions, measures and mode choice.

7.3.2 The **FTP [TR020001/APP/7.13]** which supports the application for development consent sets out the overarching framework for how future five-yearly TPs should be set up. No part of the authorised development is to be operated until a travel plan for the operation of the authorised development has been submitted to and approved in writing by the relevant planning authority as set out in the **Draft DCO [TR020001/APP/2.01]**, as specified by Requirement 30 of the Draft DCO. This TP will also serve as the ASAS for the airport. This process will involve the commencement of data collection necessary to support achievement of and measurement against Targets.

7.3.3 The operator will develop the future TPs, which will involve engagement with the ATF, the London Luton Airport Consultative Committee (LLACC) and the ESG. LBC, as the relevant planning authority, will have final approval of the TP and its Targets over its five-year duration, in accordance with the procedure for the discharge of requirements set out in Part 5 of Schedule 2 of the **Draft DCO [TR020001/APP/2.01]**.

7.3.4 The development of the TP will be managed by the Travel Plan Coordinator (TPC), who will be appointed by the operator. The role and responsibilities of the TPC are described in the **FTP [TR020001/APP/7.13]** and Table 8.1.

7.3.5 The selection of interventions and measures will focus on progress against the surface access Targets within the five-year duration of the TP.

7.3.6 The future TP's monitoring will expand upon the existing process, with five sources to inform baselining and Target development, set out in Table 7.1.

Table 7.1: Surveying and data collection methods

Method	Description
CAA Passenger Survey Data	The operator receives preliminary, unvalidated quarterly data releases from the CAA, which will aid the airport operator to identify any changes in passenger behaviour that may be attributable to circumstances beyond their control (for example strikes or closures for engineering works). However, final datasets are published by the CAA annually (typically after Easter) and it will be this finalised dataset that must be used to report annual passenger public transport mode share. This approach is consistent with the approach in the Surface Access

Method	Description
	Monitoring Plan, appended to the **GCG Framework [TR020001/APP/7.08]**. If the CAA were to no longer undertake passenger surveys an alternative methodology which replicates the surface access mode data will need to be adopted by the operator.
Annual Staff Surveys	Staff mode share will be reported based on data collected through an annual Staff Travel Survey. The airport operator will be responsible for commissioning a suitably qualified third-party contractor to carry out this survey once a year. The staff travel survey must be undertaken in a period avoiding the summer and Christmas school holidays. The airport operator should use best endeavours to ensure the survey is completed at the same time of year in subsequent years. Whilst a wider population may be surveyed, staff must be asked through the survey if they have an active airport ID pass (both landside and airside). For the purposes of a Monitoring Report, results relating to passholders only will be reported. This approach is consistent with the approach in the Surface Access Monitoring Plan, appended to the **GCG Framework [TR020001/APP/7.08]**.
Annual Employer Survey	Undertaken by TPC of all companies with operations within airport site, in partnership with the Airport Employers Community Forum (AECF).
Luton DART patronage data	Provided from ticketing data collected by the Applicant.
Snapshot Surveys	Collected by the TPC, or commissioned to third party, to provide insights into specific modes, user perceptions and profiles.

7.3.7   The operator will make the following changes to the existing surveying process:

a. Inclusion of car sharing in staff mode share (counting only the passenger(s) as a sustainable trip);

b. Inclusion of electric cycles and scooters in cycling;

c. Work from home considerations: Inclusion of questions in staff travel survey to determine any work from home arrangements if possible, number of days working from home in comparison to days working at the airport site;

d. More regular surveys: Changing the frequency of staff travel surveys, moving to annual surveys rather than the current frequency of every two years;

e. Snapshot surveys: Improved understanding of passenger and staff satisfaction and transport provision and usage, focusing on particular modes through additional on-site snapshot surveys, to improve dynamism and granularity of data analysis;

f. Introduction of employer travel surveys: Commencement of surveys with employers operating at the site, to better determine total number of staff at the site, company-specific interventions and measures; and

g. Exclusion of electric vehicles from sustainable staff mode share: Going forward, a journey by an electric vehicle will be measured as a private car trip, reflecting the primary focus of GCG surface access Limits on reducing the number of vehicle trips, with emissions considered in GCG Greenhouse Gas Emission topic area.

7.3.8 At the end of the five-year cycle, TPs will undergo a detailed evaluation, undertaken by the TPC, which will include:

a. Appraising the impact/contribution of the implemented measures to the Targets and estimating their cost efficiency;

b. Reviewing, adjusting and setting new Targets for the next five-yearly TP cycle in line with the long-term SAS objectives;

c. Selecting new interventions and measures to achieve new Targets; and

d. Setting a new funding budget for the next TP cycle.

7.3.9 The five-yearly review and reset of the TP Targets can be dependent on a number of factors including:

a. Progress towards Targets achieved to date (new baseline);

b. External factors like conditions and capacity of external transport networks serving the airport and market trends; and

c. Funds available to introduce new interventions and measures.

7.3.10 However, the operator is focused on ensuring that the Targets are ambitious and aim to directly influence the increase in sustainable surface access to and from the airport in the longer term. Therefore, it is proposed that the newly set Targets are more ambitious towards sustainable behaviours compared to those achieved in a preceding TP cycle and the GCG Limits. The level of ambition when setting the percentage change for Targets will be informed by (where applicable):

a. Striving to go beyond the Limits for passenger and staff mode share;

b. Responding to modelling forecasts in TA **[TR020001/APP/7.02]**;

c. Due regard for recent five-year CAA passenger and staff travel surveys and trends over the duration of the previous ASAS/TP;

d. A lookahead to delivery of transport infrastructure delivery in the next five year period; and

e. Engagement with the ATF and other bodies involved in the governance of the TPs.

7.4 Outline Transport Related Impacts Monitoring and Mitigation Approach (Outline TRIMMA)

7.4.1 The Outline TRIMMA is included within the **TA [TR020001/APP/7.02]** and sets out the proposed approach to addressing the uncertainty brought about by the long-term nature of the Proposed Development in terms of impact upon the highway network. The Outline TRIMMA is proposed as an agile mechanism for responsibly addressing uncertainty, enabling the Applicant and the operator to proactively detect and prevent impacts before they occur.

7.4.2 The TA sets out the principles and process of the Outline TRIMMA methodology, outlines how the Outline TRIMMA can be applied for monitoring the Transport Assessment and describes the 'Minimum monitoring proposal'.

7.4.3 This approach has been developed in order to ensure that the delivery of unnecessary and unneeded infrastructure improvements is avoided if there are changes to background traffic movements in future and/or the airport is very successful in shifting passengers onto more sustainable modes of transport for accessing the airport.

8 GOVERNANCE

8.1 Overview

8.1.1 The overarching objective of the surface access governance structure is to ensure that growth at the airport is managed in a sustainable way. This means that plans and interventions are put in place in a timely manner to ensure that the binding GCG Limits are not exceeded, and progress is made towards achieving the more ambitious Targets of each TP.

8.1.2 This Section describes the governance structure for the implementation of the FTP once development consent has been granted, including its relationship with the **GCG Framework [TR020001/APP/7.08]**. The roles and responsibilities of all defined parties are clearly set out, as well as relationships between them.

8.2 Ownership and management structure of the airport

8.2.1 The airport is wholly owned by Luton Rising (a trading name of London Luton Airport Limited). In turn, Luton Rising is wholly owned by LBC.

8.2.2 In 1998, the Luton Rising and LBC entered into a concession agreement with LLAOL for the management, operation and development of the airport. This agreement, which lasts until 2032, means that LLAOL has complete responsibility for, and control over, the day-to-day running of the existing airport. This ownership and operational structure are shown in Figure 8.1.

Figure 8.1: Ownership and management structure of the airport

Luton Borough Council
Owner of Luton Rising

Owner of London Luton Airport

London Luton Airport Operations Limited
(LLAOL)
Airport Concession Operator

8.2.3 As the airport's owner and the Applicant submitting the application for development consent, Luton Rising has a significant role to play in shaping the airport's long-term future. As the landlord of the airport, it is the Applicant's intention that those that operate the airport over the short and longer term must do so having full regard to all of the obligations that the DCO places on them in regard to the implementation of future growth, including those related to this SAS and the accompanying **FTP [TR020001/APP/7.13]**.

8.2.4 Under the terms of the current concession, LLAOL will operate the airport until 2032. However, due to the way that DCOs work, any requirements secured through the Order (including the requirements to implement the TP) fall to the undertaker of the development, which in this case is Luton Rising. Accordingly, Article 8 of the **Draft DCO [TR020001/APP/2.01]** sets out the proposed mechanism, through an agreement between Luton Rising and LLAOL, by which

the benefit of the order (as defined by Article 7) would be transferred from Luton Rising to LLAOL. The transfer is subject to the same restrictions, liabilities and obligations as would apply under the Order as if those benefits or rights were exercised by the undertaker.

8.2.5 At the end of the current concession, the restrictions, liabilities and obligations of the DCO would revert from LLAOL to Luton Rising. They would remain with Luton Rising until a new transfer agreement was enacted with an operator. In this way, the requirement to implement GCG as a result of the DCO will always be in place (whether with the airport operator or Luton Rising) and can also be transferred to any new future operator.

8.2.6 Within this document therefore, the governance processes have been set out with reference made to the airport operator, rather than Luton Rising, as if the benefit of the order has been transferred. As part of the development of these proposals, Luton Rising has worked closely with LLAOL to understand how both parties can build upon the work undertaken to date to increase the sustainability of operations at the airport and ensure that the TP is delivered successfully.

8.3 Forums and management structure

8.3.1 Day-to-day management of surface access at the airport is currently undertaken by the operator, LLAOL. As the airport's owner, Luton Rising also plays a significant role, particularly with regards to capital expenditure on transport improvements – for example, the Luton DART was mainly funded by Luton Rising, and ultimately LBC.

8.3.2 LLAOL and Luton Rising currently engage with representatives of local communities, local authorities and transport operators regarding surface access matters through two existing forums:

a. The LLACC, which is a statutory requirement for designated airports under the Civil Aviation Act 1982, and includes a dedicated Passenger Services Sub-Committee (PSSC), in addition to the main committee; and

b. The ATF, which is a requirement from the Department for Transport (DfT 2013) The LLACC includes representatives from local authorities, town and parish councils, campaign groups, airlines, and has an independent chair. It is also attended by LLAOL and Luton Rising. The remit of the LLACC extends beyond surface access, and also covers topics such as aircraft noise, customer service levels and airport security.

8.3.3 The ATF is comprised of representatives from local authorities, National Highways, and public transport operators. Current attendees include LBC, North Herts District Council, Stagecoach, Arriva, National Express, APCOA Parking, Govia Thameslink Railway (GTR), and Enterprise. It is intended that the attendance of the ATF is also encouraged from the relevant highway authorities and National Highways.

8.3.4 Both the LLACC and ATF are advisory bodies, which do not have any formal 'approval' roles relating to surface access arrangements. Instead, they exist to

provide feedback to the airport's management team on the issues which are of concern to those using the airport, living around it, or working/operating at it.

8.3.5 The LLACC meets quarterly, and the ATF meets every six months, and both would be retained as part of the expanded governance proposals associated with the Proposed Development, to provide feedback and enable discussion about the ongoing day-to-day operations at the airport.

8.4 Travel Plan governance

8.4.1 The need to produce, regularly review and update the TP, based on the **FTP [TR020001/APP/7.13]**, is secured through Requirement 30 of the **Draft DCO [TR020001/APP/2.01]**. The governance process associated with this requirement, alongside the existing day-to-day management, is set out in Figure 8.2.

Figure 8.2: Travel Plan governance
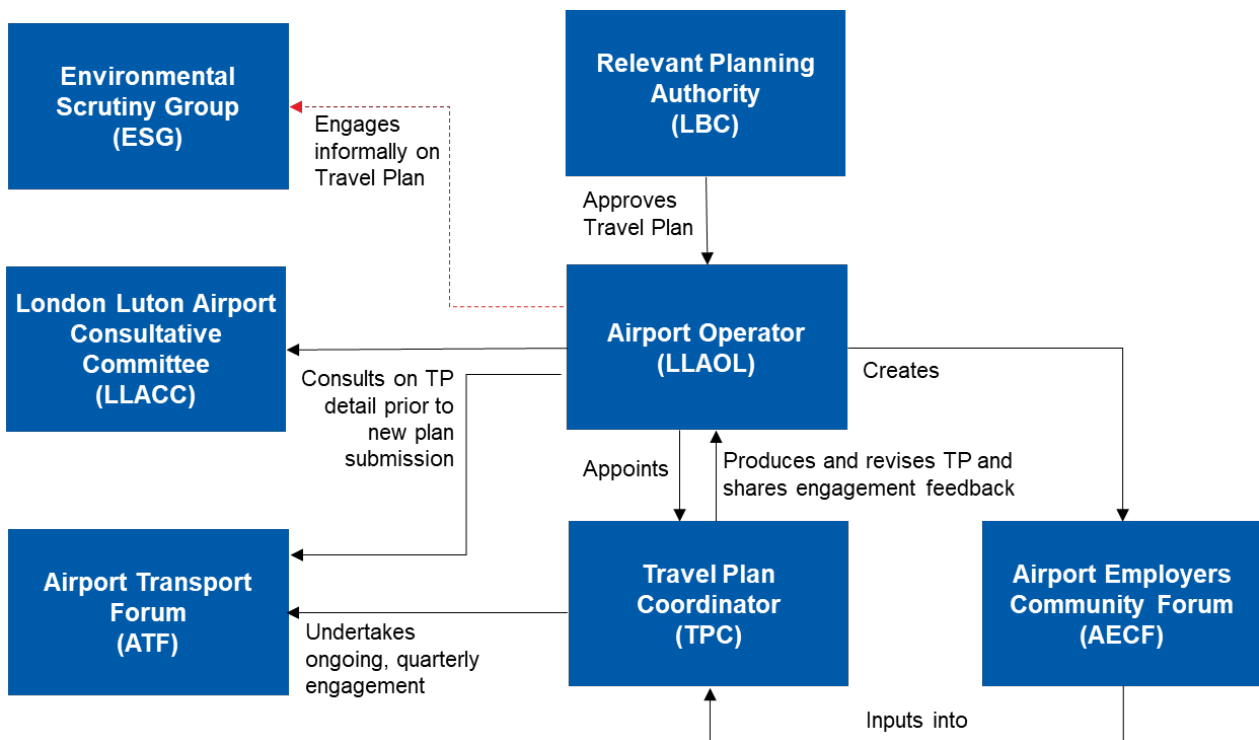
8.4.2 As can be seen in Figure 8.2, there are several key roles and bodies / organisations that will be involved in governance process for the TP. The roles and responsibility of each body / organisation are set out in Table 8.1.

Table 8.1: Travel Plan governance – roles and responsibilities

Body or Organisation	Roles and Responsibility
Airport operator	• To produce and implement the TP, in accordance with the requirements of the DCO; • To review and update the TP every 5 years, aligned with SAS vision and objectives;

Body or Organisation	Roles and Responsibility
	• To consider the requirements of the **GCG Framework [TR020001/APP/7.08]**, including the ongoing performance against the GCG Limits; • To undertake monitoring of surface access, in accordance with the TP (and GCG Framework); • To appoint a TPC to oversee the on-going development and implementation of the TP; and • To establish an AECF, to ensure airport tenants and occupiers are involved with the development and implementation of the TP, in addition to the management of the airport (both the operator and the Applicant).
TPC	• To lead the implementation and development of the TP; • To have responsibility for the annual staff travel survey and employer survey; • To undertake or commission snapshot surveys, gathering information about how staff and passengers currently travel to the airport; • To implement and promote interventions and measures which aim to reduce the use of unsustainable modes; • To act as the point of contact within the organisation for anyone requiring transport advice or information; • To monitor the progress of the TP towards its Targets and to take action where appropriate to ensure the Targets are met; • To be the point of contact for the TP to supply Travel Plan related information when required; • To work in partnership with the AECF; • To be responsible for keeping the TP document up to date, including the action plan and monitoring reports; and • To keep up to date with issues and new initiatives that affect sustainable transport.
AECF	• To be created by LLAOL, overseen by LLAOL HR director with attendance of local HR managers; • To input into the five-yearly TPs, working with the TPC; • To implement relevant TP activities within the respective constituents' organisations at the airport; • To encourage uptake of staff surveys and other monitoring; and • To respond to monitoring programmes with advice on management and mitigation.

Body or Organisation	Roles and Responsibility
LLACC	• To provide feedback to the airport operator on the proposed content of each TP.
ATF	• To support and work with the airport operator on all activities and issues in relation to the surface transport serving the airport; • To provide feedback to the airport operator on the proposed content of each TP; and • To share details of transport schemes being delivered by each highway authority that would impact on travel to/from the airport (Relevant Highway Authorities, National Highways).
ESG	• To be informally engaged (if agreed) on content in the TP, alignment with GCG monitoring and Limits and performance of the airport in reaching its vision and ambitions for sustainable surface access.
Relevant Planning Authority (LBC)	• To discharge applications under Requirement 30 and approve periodic TPs produced by the airport operator; and • To ensure that the feedback from the relevant highway authorities, National Highways, and the ATF has been accounted for in the production of each TP.

8.5 GCG governance

8.5.1 The **GCG Framework [TR020001/APP/7.08]**, will manage the environmental effects of the expanding, expanded, and lifetime operation of the airport, as summarised in Section 7.2, and will be managed through its own dedicated governance process that will apply across each of the four environmental topics within GCG. The relevant aspects for surface access are summarised here, including the interfaces between the TP and GCG. Figure 8.3 summarises the GCG surface access governance.
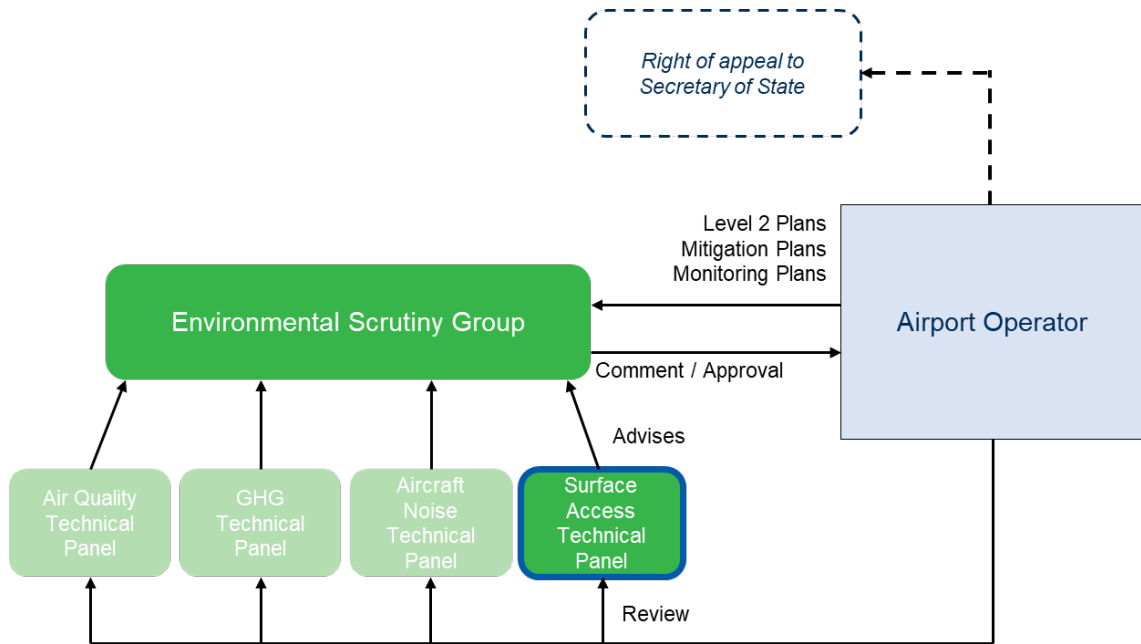
Figure 8.3: GCG surface access governance

Table 8.2: GCG surface access governance – roles and responsibilities

Body or Organisation	Roles and Responsibility
Airport operator	• Implement the TP, to ensure that GCG surface access Limits are not breached; • Undertake monitoring of surface access, in accordance with the Monitoring Plan; • Prepare a Monitoring Report periodically to demonstrate compliance with Thresholds and Limits; • Prepare a Level 2 Plan or Mitigation Plan if the surface access Level 2 Thresholds or Limits are exceeded; and • Organise annual community engagement events to receive feedback from local communities on the GCG process.
Surface Access Technical Panel	• Review the technical veracity of information provided to them, as part of Monitoring Plans, Monitoring Reports, Level 2 Plans and Mitigation Plans; • Attend annual community engagement events to receive feedback from local communities on the GCG process; and • Provide recommendations to the ESG to inform their decisions relating to Monitoring Plans, Level 2 Plans, Mitigation Plans and potential enforcement action.
ESG	• Providing commentary on periodic Monitoring Reports produced by the airport operator following reviews by the relevant Technical Panels;

Body or Organisation	Roles and Responsibility
	• Approving or refusing Level 2 Plans or Mitigation Plans put forward as required by the airport operator if any GCG environmental effect has exceeded a Level 2 Threshold or Limit respectively; • Where the airport operator can demonstrate that this is the case, certifying that an exceedance of a Level 2 Threshold or Limit is due to circumstances beyond the operator's control; • Forum for consideration of statutory enforcement representations; • Mutually agreeing to modifications to the Terms of Reference included at Appendices A and B and Monitoring Plans included at Appendices C to F of the **GCG Framework [TR020001/APP/7.08]**; and • Approving or refusing applications by the airport operator to modify timescales within the GCG framework, or Level 1 Thresholds, Level 2 Thresholds or Limits, as allowed for under Paragraph 25 of Schedule 2 of the **Draft DCO [TR020001/APP/2.01].**
Secretary of State	• Provide a route of appeal against any decisions made by the ESG.

8.6 Funding of sustainable transport interventions and measures

8.6.1 The Applicant and operator have a strong legacy of investment in sustainable travel, as shown previously in Table 4.1.

8.6.2 The proposed interventions and measures will require funding to support a mixture of both operating and capital costs. This will require a step change from existing operations and will require suitable funding mechanisms to allow the assessment of potential funding options that are appropriate and suitable. This will involve developing an internal framework for assessing costs and benefits of surface access interventions to ensure that the Applicant and operator are making investment decisions that maximise the opportunity for reaching set Targets, achievement of the objectives and represent value for money, in line with the TP and GCG monitoring.

8.6.3 The operator currently retains a portion of revenues from parking charges to fund a variety of capital and operating projects aimed at improving sustainable transport options and in surrounding communities. This funding source likely to be particularly relevant to interventions and measures for bus and coach and walking and cycling.

GLOSSARY AND ABBREVIATIONS

Term	Definition
AECF	Airport Employers Community Forum
ASAS	Airport Surface Access Strategy
ATF	Airport Transport Forum
CAA	Civil Aviation Authority
CBC	Central Bedfordshire Council
CoCP	Code of Construction Practice
DCO	Development Consent Order
DfT	Department for Transport
DLR	Docklands Light Railway
EIA	Environmental Impact Assessment
ES	Environmental Statement
ESG	Environmental Scrutiny Group
EWR	East West Rail
FTP	Framework Travel Plan
GCG	Green Controlled Growth
GHG	Greenhouse Gases
GTR	Govia Thameslink Railway
HCC	Hertfordshire County Council
KPI	Key Performance Indicator
LBC	Luton Borough Council
LLACC	London Luton Airport Consultative Committee
LLAOL	London Luton Airport Operations Limited
Luton DART	Luton Direct Air to Rail Transit
mppa	million passengers per annum
NH	National Highways (formerly Highways England)
NPSNN	National Policy Statement for National Networks
NSIP	Nationally Significant Infrastructure Project
Outline TRIMMA	Outline Transport Related Impacts Monitoring and Mitigation Approach
PHV	Private Hire Vehicle
SAS	Surface Access Strategy
TP	Travel Plan
TPC	Travel Plan Coordinator
Full TRIMMA	Full Transport Related Impacts Monitoring and Mitigation Approach

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