

31 May 2023

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Your Ref: TR020001

Dear Jo

**Planning Act 2008 (as amended) – Section 89
The Infrastructure Planning (Examination Procedure) Rules 2010 – Rule 9
Application by London Luton Airport Limited for an Order Granting Development Consent for
the London Luton Airport Expansion project
Procedural Decision made under Section 89(3)**

Thank you for your letter of 16 May 2023, which confirms that you have been appointed by the Secretary of State (SoS) to be the lead member of the Examining Authority (ExA) that will examine and make a recommendation to the SoS for Transport on the London Luton Airport Expansion project. Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') and its project team look forward to working with you and the other members of the ExA.

The letter also confirms that the ExA has issued a number of Procedural Decisions requesting further information in addition to some clarifications and corrections on the submitted documents.

This letter sets out the Applicant's interim response to the Rule 9 letter, taking each matter requested from the Applicant in turn.

Statements of Common Ground with the host Local Authorities

The Applicant notes that the ExA has requested that the Applicant produce individual SoCGs with each of the host local authorities. Following receipt of your letter, the Applicant is now working with each host local authority to produce individual, draft SoCGs.

Accounting for COVID-19 in transport modelling

The ExA has requested that the Applicant reviews its transport modelling in light of new Department for Transport interim advice, dated April 2023, regarding the treatment of the COVID-19 pandemic in transport modelling. The ExA has requested that the Applicant amend the modelling and application documentation (including any dependent assessments) as necessary.

The ExA has requested that this exercise be completed, and any amendments / updates made, by 23 June 2023. The ExA has made clear that if such a review would not be achievable within this timescale, then the Applicant is to write to the ExA by 31 May 2023, providing:

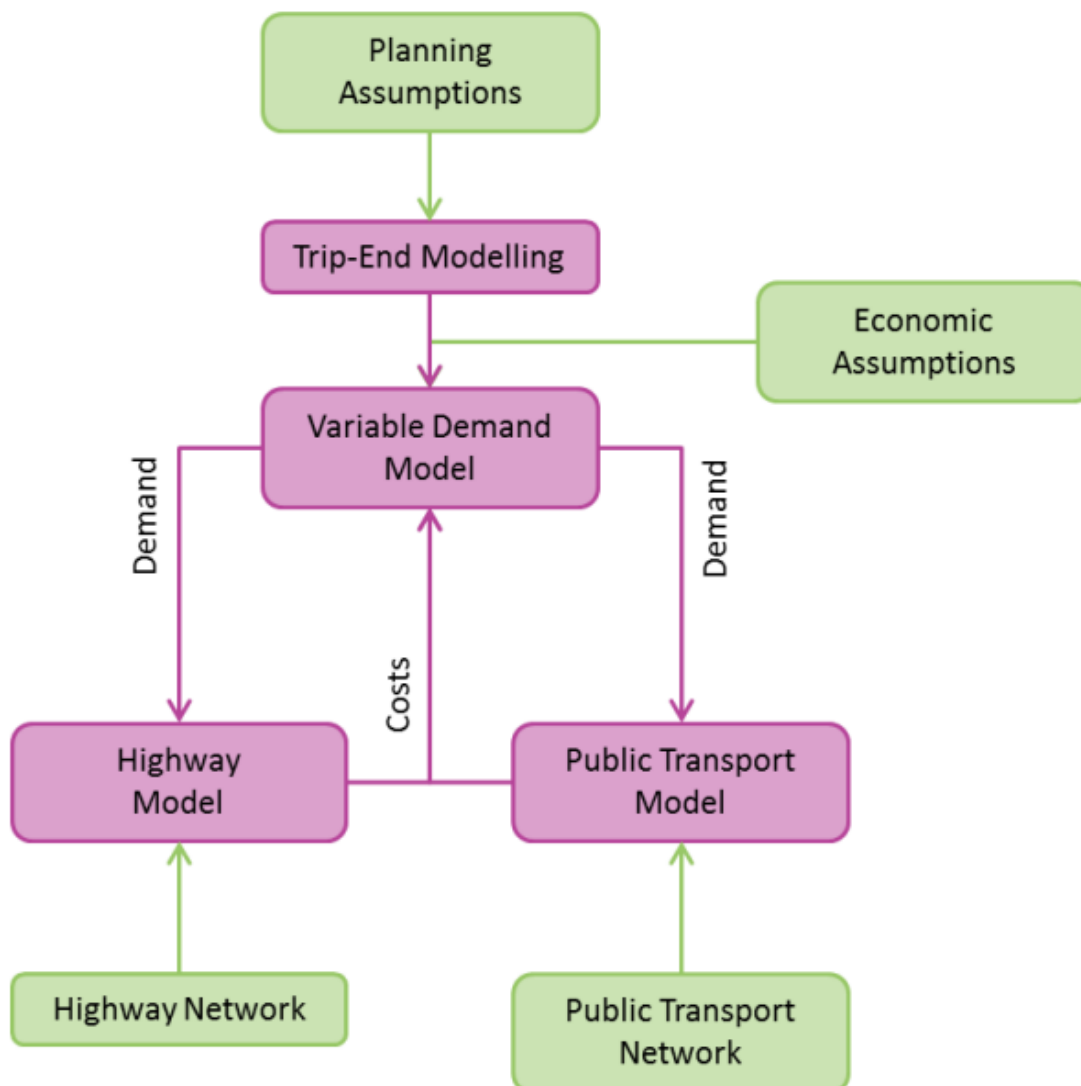
- a detailed timetable explaining when this information could be submitted,
- why the additional time is needed; and
- any implications that this might have for the Examination.

The Applicant has reviewed the DfT's guidance on Forthcoming Change: Accounting for COVID-19 in Transport Modelling and Associated TAG Unit M4 Forecasting and Uncertainty, March 2023.

This guidance contains options to address the potential impacts on both base year modelling and forecasting assumptions.

In considering the request, it is important to note that the guidance was published after the application for Development Consent had been accepted for examination and, therefore, could not have been reflected at the time of submission. It is also important to note that the Central Bedfordshire and Luton Transport Model, Luton Airport version (CBLTM_LTN) is a **full modelling suite** containing (and as illustrated in the figure below) the following models:

- a highway assignment model;
- a public transport assignment model;
- a variable demand model; and
- a trip-end forecasting tool (based on the DfT's CTripEnd software).



The modelling components consider the following time periods:

Period	Highway Assignment	Public Transport Assignment	Variable Demand Model
AM Peak	08:00 to 09:00	07:00 to 10:00 (average hour)	07:00 to 10:00
Interpeak	10:00 to 16:00 (average hour)	10:00 to 16:00 (average hour)	10:00 to 16:00
PM Peak	17:00 to 18:00	16:00 to 19:00 (average hour)	16:00 to 19:00
Off-peak	n/a	n/a	19:00 to 07:00

It also considers the following trip purposes/ vehicle classes:

Model Components	User Classes
Variable Demand Model	Commuting; Home-based Employers' business; Home-based other; Non-home-based employers' business; Non-home-based other; Light Goods Vehicles (LGV); and Heavy Goods Vehicles (HGV).
Highway Model	Car Commuting; Car Business; Car Others; LGV; and HGV.
Public Transport Model	Bus/Coach travellers Rail Travellers Walkers

The modelling suite has a base of 2016, with three future year forecasts:

- 2027;
- 2039; and
- 2043.

The forecast years match the proposed airport expansion assessment phases/years. When undertaking updates to the model, it will be necessary to reflect these changes across all time periods and all user classes.

Considering the scale and complexity of the strategic model and the stage of the project, it is proposed to undertake some investigation into traffic flows and travel patterns to determine the most appropriate and proportionate method to be applied to account for the potential COVID-19 impacts on the CBLTM_LTN model.

The DfT guidance contains options to address the potential impacts on both base year modelling and forecasting assumptions. At this stage it is not envisaged that the review will result in any changes being required to the base year modelling. It is proposed to undertake a proportionate approach given:

- the stage of the project (pre-examination) would make any substantial update to the traffic modelling challenging, particularly the likelihood of adding significant delay to the project; and
- the continuing and on-going uncertainties in baseline and forecast transport conditions from external factors.

Having considered the work that may be required, and the scale and complexity of the CBLTM-LTN model as highlighted above, it will not be possible for the Applicant to review its transport modelling by the stated deadline of 23 June 2023.

As requested, the Applicant's proposed timetable for considering and developing a methodology, and then undertaking any amendments/updates is as follows:

- June 2023 – Scoping and determining a methodology
- July / August 2023 – Updating and running the future year models
- August / September 2023 – Checking, reviewing and comparing outputs
- September 2023 – Reporting of modelling results
- End of October 2023 – Submission

In addition to the CBLTM-LTN model, a proportionate updating of the VISSIM model, which supplemented the strategic modelling and supported the development of the local mitigation measures, will be undertaken. It is expected that this could be completed within the above timeframes.

The timescales allowed for are the minimum the modelling team require to undertake the work and do not include for engagement with stakeholders including National Highways or Local Highway Authorities. The programme does not include for any time required by other environmental disciplines for updates to dependant assessments. We would note that the approach set out above would be reported as an addendum to the submitted documents and should be considered a sensitivity test to confirm the findings of our core assessments.

The traffic data generated by the traffic model described above was employed in a number of aspects considered in the Environmental Impact Assessment and reported in the Environmental Statement (ES). The potential implications of this review and new guidance on each of those aspects is summarised as:

- **Noise** – The traffic data used for noise modelling is the annual average weekday traffic (AAWT). The assessment of significant effects due to road traffic noise considers absolute noise levels in the Do Something scenario, as well as the change in noise levels between the Do Minimum and Do Something scenarios. Substantial changes in noise levels require a relatively large relative changes in traffic volume, for example, an increase in road traffic volume of approximately 25% is required to result in an increase in noise of 1dB (all else being equal). As the potential relative changes in road traffic volume when considering the new guidance are anticipated to be substantially less than this, it is expected that there would be no new or materially different significant effects than those reported in the ES.

- **Air quality** – The traffic data used for the air quality dispersion modelling is annual average daily traffic (AADT) for each link within the affected road network (ARN) (defined in the ES). The Covid-19 impacts may affect the traffic at a link level. However, criteria in relevant guidance can be used to determine if the link level AADT changes, as a result of accounting for Covid-19, can be considered insignificant, without requiring detailed dispersion modelling. It is likely that accounting for Covid-19 will reduce the AADT of non-airport related traffic, which would result in exposure to lower total concentrations of pollutants. Therefore, the assessment in the ES assesses a more conservative scenario. Due to the significance criteria methodology used (as described in the ES), the possible effect to the assessment of significance is that conclusions will remain unchanged, or the effects will be less than those reported in the ES. This will be as a result of reducing total pollutant concentrations. Therefore, it is unlikely that new traffic data accounting for Covid-19 will significantly change the conclusions reported in the ES.
- **Traffic and Transport** – Traffic flow data extracted from traffic modelling is used to determine the likely significant environmental effects across a range of traffic and transport criteria. It is not considered likely that the change in traffic levels as a result of the change in growth assumptions from COVID-19 will change the outcomes reported in the ES or the level of mitigation proposed.
- **Greenhouse Gasses (GHG)** - The traffic data used in the GHG assessment only considers airport related traffic for Do Minimum and Do Something scenarios, rather than the wider background traffic that will be affected by Covid-19 impacts. There could be some minor changes in distance travelled due to rerouting of airport related traffic, as a result of reduced non-airport related demand elsewhere on the road network, however, from evidence to date the variance between model runs has always been negligible.
- **Health** – With regards to the air quality related health impacts, similar to the air quality implication, it is likely that accounting for Covid-19 will reduce the AADT of non-airport related traffic, which would result in the population being exposed to lower total concentrations of pollutants than those reported in the ES. Therefore, the assessment in the ES assesses a more conservative scenario. The possible effect to the conclusions will remain unchanged, or the effects will be less than those reported in the ES, as a result of air quality.
- **Biodiversity** - With regards to the air quality related impacts on ecological receptors, similar to the air quality implication, it is likely that accounting for Covid-19 will reduce the AADT of non-airport related traffic, which would result in exposure to lower total concentrations of relevant pollutants. Therefore, the assessment in the ES assesses a more conservative scenario. The possible effect to the conclusions will remain unchanged, or the effects will be less than those reported in the ES, as a result of air quality.

The traffic data outputs described above will be reviewed by each specialist assessment team and implications considered and confirmed. At this stage, however, it is anticipated that likely changes would not result in material changes to the overall assessment of significant effects in the ES. If confirmed, a qualitative commentary on the implications for the relevant environmental assessments can be provided in the reporting prepared within the programme described above.

Noise Information and Green Controlled Growth

The applicant notes that the ExA has also requested additional noise information by 23 June 2023. The Applicant is in the process of providing the requested additional information and will provide this by 23 June 2023.

Matters arising Post Acceptance

Finally, the ExA has requested the Applicant to review the list contained in Annex B of its letter and consider whether corrections, resubmissions or additional submissions are needed. The Applicant is in the process of updating these documents and plans listed in Annex B and will submit this by 23 June 2023.

I trust this letter is helpful. Please get in touch if you would like to discuss any of the matters detailed in this letter.

Yours sincerely,



Antony Aldridge
Head of DCO Programme