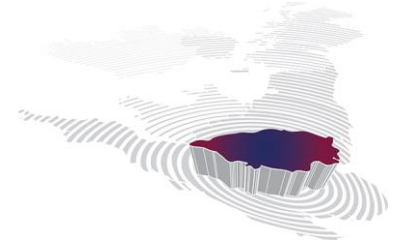




ENGLAND'S
ECONOMIC
HEARTLAND



National Infrastructure – Development
Consent Order for Luton Airport Expansion
Submitted via the Planning Inspectorate
online portal

Email:

LutonAirport@planninginspectorate.gov.uk

EEH Business Unit
c/o Buckinghamshire Council
Walton Street Offices
Walton Street
Aylesbury
HP20 1UA

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Interested Party Number: 20040706

England's Economic Heartland Written Representation – Development Consent Order for Luton Airport Expansion

England's Economic Heartland (EEH) is the sub-national transport body (STB) for the Heartland region representing the transport authorities covering the area from Swindon, through Buckinghamshire, Oxfordshire, Milton Keynes and across to Cambridgeshire and Peterborough, and from North and West Northamptonshire councils, Central Bedfordshire, Bedford Borough, across to Luton and Hertfordshire Councils.

Formed as a partnership of local authorities and supported by DfT, EEH, as the STB, is responsible for providing government with advice on which transport infrastructure and service improvements are priorities for investment in the region if we are to realise our economic ambitions and net zero commitments.

EEH recognises the economic significance of the United Kingdom's aviation network. The ability to connect regions economically has enabled trade links to be established both domestically and internationally. Such linkages support economic activity across the region and beyond, bringing significant benefits to our businesses and residents. The proposed expansion of Luton Airport will create opportunities to generate benefits for the local economy and residents, especially in the use of a local airport, thereby providing relief to other parts of the wider South-East airport system.

Luton Airport is the only major airport located within our region. It is a significant asset: as a key international gateway, a major regional employer and a key contributor to the economy. As one of the top five busiest airports in the UK, it is a focus for European services and a key hub for private business aviation services. Its expansion impacts and contributes to the economy beyond Luton itself, having significant regional impact supporting both central government and the region recognised by government for its economic potential – known as the Oxford to Cambridge Pan-regional Partnership. The region plays a key role in the UK economy, particularly in key sectors such as science, innovation and advanced manufacturing.



www.EnglandSEconomicHeartland.com



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EEH believes that the proposal to expand Luton Airport should be viewed through the lens of the strategic ambition for the region, as well as within the context of national targets, including those in relation to decarbonisation of the transport system.

EEH's Transport Strategy, published in 2021, sets out the strategic ambition for the region. This includes a commitment to: support net zero transport by 2050; improve quality of life and wellbeing through a safe and inclusive transport system accessible to all; support the regional economy by connecting people and businesses to markets and opportunities; and ensure the Heartland works for the UK by enabling the efficient movement of people and goods through the region and to/from international gateways, in a way which lessens its environmental impact.

Our strategy states that, 'as one of the world's leading economic regions our continued success is dependent upon being connected globally'.

The nature of planning, policy and funding decisions for aviation in England means aviation is not included in EEH's transport strategy, nor are the implications for issues such as emissions from aviation.

In line with the functions of EEH, as a sub regional transport body as set out in the Cities and Local Government Devolution Act 2016¹, EEH's response to proposals for the expansion of Luton Airport are focused on matters relating to surface access. However, our local authority partners may make their own representations related to this area of consideration, for example around the impact of expansion on the number of flight paths.

The EEH transport strategy actively encourages investment in improved, decarbonised surface access connectivity that addresses and reduces the environmental impact of international gateways. The recent completion of Luton's Direct Air Rapid Transit (DART) has improved connectivity between Luton Airport Parkway Station and the airport. Improving travel opportunities via national rail services stopping at Luton Airport Parkway is key to reducing the need to travel to the airport by private car for travellers coming the north and south.

EEH is currently developing a number of connectivity studies that show what the most effective connectivity solutions are for key corridors across the region. Three of these studies cover the Luton Airport area. The evidence captured in these will be invaluable in focusing investment proposals to improve connectivity to the airport. They are guided by the policies set out in the EEH transport strategy and steered by our local authority partners. The package of interventions identified will form a key part of our investment pipeline for the region. We believe the outputs from the connectivity studies will provide useful evidence regarding future opportunities to improve surface access to Luton Airport. The studies have already highlighted the need for better east-west connectivity and could form the basis for prioritising and informing funding of both Section 106 and the suggested Sustainable Transport Fund.

In addition, our emerging work on regional bus and coach connectivity has highlighted gaps in services and the need for better long-distance bus connectivity. This has shown a need for better connectivity from Luton Airport to Buckinghamshire, Hertfordshire and Oxfordshire by both regular bus services and longer distant coach services. Early results from the connectivity studies highlighted a need and potential for improved bus services to Luton with real opportunity to extend or provide a similar service to the existing F70 to serve Aylesbury via the Luton to Dunstable Bus Way or through extending services through Hemel Hempstead beyond to Aylesbury and even on to Oxford.

We are pleased that the applicant has included a strategic surface access plan as part of their application as this is key to improving accessibility and mitigating the impact of the expansion as expressed in our response to the 2020 Statutory Consultation. The surface access plan is

¹ [Cities and Local Government Devolution Act 2016 \(legislation.gov.uk\)](https://www.legislation.gov.uk)



essential to ensure the airport is accessible for workers, travellers, services and freight by more sustainable modes, and alternative fuels with a focus on decarbonisation to move away from dependence of combustion-engine vehicles for accessibility. While we welcome the surface access plan we note that the main focus is on north-south connectivity, namely the Midland Mainline corridor with connections at Luton Parkway and north south vehicular traffic accessing the airport from the M1. Evidenced through our connectivity studies there is a real need for a greater focus on connectivity between Luton airport and the rest of the EEH region, particularly east and west connectivity.

We feel that there needs to be greater emphasis in the surface access plan for Luton Airport's proposals in the following areas:

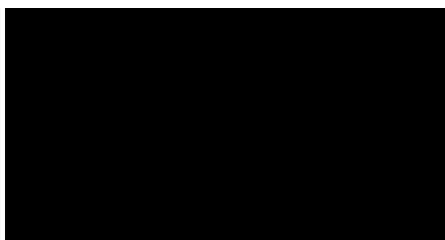
- Investment in the delivery of measures that improve local connectivity between the airport and the immediate surrounding area – these measures should be supported by proposals that actively engage airport employees (both existing and future) and encourage them to use active travel modes. It is noted that at present the access is very vehicle focused with no cycling access and the main active travel route being up and down a hill and under the existing runway. These issues should be addressed to improve active travel options and help meet stretch targets to achieve modal shift.
- Investment in the delivery of public transport infrastructure to provide enhanced travel options for those accessing the airport from all areas of the EEH region. This should include better connections to Aylesbury, Hertfordshire and Oxford in terms of coaches and regular bus services. There is a real opportunity for reinstating the previous 61 bus route or the existing F70 route to be extend to Aylesbury and beyond to Oxford, and more regular direct connections with London Stansted Airport both by coach and public transport. There should be on-going funding made available to support these services.
- The applicant should ensure that there is sufficient funding to ensure that transport infrastructure and revenue funding is provided to meet modal shift targets to support alternative modes of travel to all parts of the region. It is unclear how the Sustainable Transport Fund levels of available funding would be determined to ensure there is sufficient funding to deliver the measures required to support and mitigate the proposed development. This should be based on actual costs rather than the 'wait and see' or formulaic approach suggested. This would need to be part of a robust monitoring and manage approach.
- Car parking – significant increases in car parking are proposed but increases to on-site car parking should only be considered once opportunities to improve local connectivity and public transport infrastructure and services have been fully exploited. Any changes in car parking should also relate and tie to the mode shift targets.
- Investment in improved highway infrastructure should prioritise improvements that support local connectivity and public transport infrastructure and services. Like any development it should be the developer's responsibility to provide highway mitigation outside of their red line boundary through Section 278 agreements. There is a need to address potential issues on A505 through Hitchin, Luton's MRN and potential impacts on local villages in Bedfordshire, Buckinghamshire and Hertfordshire, especially through the construction phase.
- Midland Main Line – the applicant should discuss with the local train operators (currently East Midlands Railway and Thameslink) the level of service required to enable Luton Airport Parkway station to serve as a gateway to the airport: the significance of rail will increase further as a result of the proposed expansion, and this must be reflected in the level of service provided with seamless connectivity with the DART.
- EEH will continue to work with Luton Airport and Luton Borough Council in order to ensure improved links with the future East West Rail route. We will particularly seek to identify how additional services and/or changes to train services could offer improved travel opportunities for Luton Airport's passengers. Through effective interchange between Midland Main Line services and East West Rail, Luton Airport could see greatly improved rail connectivity with Milton Keynes, Cambridge, Oxford and beyond.
- Bus and Coach Provision – the proposal to establish a new coach station and a new bus station is welcomed. However, there is a need for the applicant to work with service

providers to identify the level of services required in order to ensure sufficient funding is provided to increase both existing service frequencies and the range of destinations served by buses and coaches, especially focusing on wider regional east and west connectivity. This funding should be through Section 106 funding separate from the Sustainable Transport Fund as these are considered essential to provide regional connectivity and mitigate the development. Luton Council's BSIP funding could also support improving airport connectivity beyond its boundaries.

- Freight traffic should be restricted to using the SRN and MRN to ensure there is no impact of increasing freight movements on local communities.
- The applicant proposes a range of different mitigations to offset the impact of the airport expansion on the environment at surface level. This is to be welcomed. Whilst this is outside of the remit of EEH as a transport focused organisation, there is a need for the applicant to quantify how they will ensure the proposal is consistent with the national targets to bring greenhouse gas emissions to net-zero by 2050. This is pertinent, not only for surface access to the airport, but also given the need for the aviation sector to make its own contribution towards achieving the net zero carbon target for the UK by 2050. The applicant should consider how its own and airside operations can contribute to net zero, potentially through electric air side vehicles.
- It is unclear how the Sustainable Transport Fund would be determined or administered and how it would ensure that the focus is regional rather than local. Not all EEH Local Transport Authority partners are currently represented on working groups so there is concern that their connectivity requirements and transport mitigation priorities could be overlooked. Therefore, it is suggested to ensure a strategic and fair focus that EEH are part of any decision-making group to ensure that funding is focused where it is likely to have the most impact.

In conclusion, EEH is supportive of the expansion of Luton Airport as a significant international gateway and focus for economic opportunities that impact across the whole of the EEH region. However, given this strategic significance, EEH feel there needs to be further work on planning for sustainable transport access, particularly in relation to east-west regional connectivity, and greater clarity on levels of funding to support mitigation of the development, including administration and apportionment of the proposed Sustainable Transport Fund.

Yours sincerely



Councillor Liz Leffman
Interim Chair, England's Economic Heartland