

## **Development Management**

### **Central Bedfordshire Council**

Priory House, Monks Walk  
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Application by London Luton Airport Limited for an Order Granting Development  
Consent for the London Luton Airport Expansion project

## **WRITTEN REPRESENTATION**

Date – August 2023

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## 1. Introduction

- 1.1 This document sets out Central Bedfordshire Council's (CBC) Written Representation (WR) on the application for a Development Consent Order (DCO) on land at London Luton Airport that would authorise the expansion of the airport to increase passenger numbers to 32 million per annum, provision of a second terminal and provision of associated infrastructure over a phased period.
- 1.2 Central Bedfordshire is a unitary authority and therefore performs functions as the local planning authority, local highway authority, waste planning authority and local lead flood authority. CBC are a host authority as part of the Order Limits fall within the administrative area of CBC.
- 1.3 The content and conclusions of the WR were presented to the Executive Member for Planning and Development in accordance with Central Bedfordshire Council's Constitution.
- 1.4 CBC have prepared a Local Impact Report (LIR), which is a detailed technical report focusing on the environmental, social and economic impacts raised by the proposed development and summarising the positive, neutral and negative impacts. The LIR should be read in conjunction with the WR. In addition, CBC have also prepared a Principle Areas of Disagreement Summary Statement (PADSS), a copy of which has already been submitted to the Examining Authority (ExA).
- 1.5 CBC have been in consultation with Luton Rising over the proposed scheme for a lengthy period, providing detailed responses to the statutory pre-application consultations. CBC are continuing to engage with the applicant to progress the Statement of Common Ground (SoCG). Further engagement on this will be undertaken throughout the DCO process.
- 1.6 Guidance contained within PINS Advice Note 2: The Role of Local Authorities in the Development Consent Process (February 2015) has been used to inform the WR. This states that '*a written representation is the most appropriate document for a local authority to set out its view on the application i.e., whether or not it supports the application and its reasons.*' It is noted that once a representation has been submitted it cannot be withdrawn, although CBC reserve the right to submit further representations during the examination process.

## 2. Summary of Key Issues

- 2.1 Based on the assessment in the LIR the proposals would have significant negative impacts in respect to air quality, cultural heritage, health and community, landscape and visual, noise and vibration and traffic and transport both during construction and operational phases.
- 2.2 It is acknowledged that positive benefits would arise, most notably in respect to employment opportunities, which is discussed in the LIR. Across some topic areas (biodiversity, greenhouse gas emissions, major accidents, soils and geology, water resources, and waste), due to suitable mitigation, the resultant impact for Central Bedfordshire would be neutral, as discussed in the LIR. Below is a summary of the key issues for Central Bedfordshire.

### Air Quality

- 2.3 There is concern that local residents living in close proximity to the application site, particularly those near to the southern boundary would be adversely affected by dust and pollutants during the construction phase. Shortcomings have been identified in the Construction Code of Practice and further measures should be included in the Dust Monitoring Plan. Through amendments to these documents, it is likely that the resultant impacts could be reduced.
- 2.4 Air quality impacts during operational phases is the main area of concern. The extent of monitoring undertaken in Central Bedfordshire is limited and is a point raised within the LIR. This also applies to future monitoring as set out in the Green Controlled Growth (GCG) Framework.
- 2.5 Overall, there is concern regarding air quality and the impact on human health of residents in Central Bedfordshire.

### Cultural Heritage

- 2.6 There are two key designated heritage assets, Someries Castle Scheduled Monument and Luton Hoo Registered Park and Garden within close proximity to the airport. Due to the scale and massing of development, close proximity, and intensity of operations, these assets will be impacted by both the construction and operation of the development, as discussed in detail within the LIR. Issues have been raised in the LIR regarding the robustness of the assessments that have been undertaken to date.

### Health and Community

- 2.7 Owing to the nature of the application there is significant concern regarding the impact of the proposed development on public health and wellbeing of local residents. Health impacts, both physical and mental, would be influenced by air quality, noise, reduced tranquillity due to reduced enjoyment of the countryside. Shortcomings in the assessment have been identified, notably the omission of local data sources, which is discussed in detail in the

LIR. Based on the current information the Council consider that the health impacts would be significant.

### Landscape and Visual

- 2.8 Due to the extensive scale of development proposed and its elevated position it is considered that the development would have significant impacts on the landscape setting of the area. This would be perceived from short distance views, notably the network of public footpaths and bridleways to the south of the site. Mitigation in the form of hedgerow and boundary treatment is proposed in these locations but there is lack of information to determine whether this is suitable in the context of the character of the area.
- 2.9 The development would also be visible from Luton Hoo RPG, Someries Castle and public rights of way to the west of the airport. Further afield there would be impacts, both during construction and operation, on the Chilterns Area of Outstanding Natural Beauty (AONB), which is valued for its scenic quality. Whilst mitigation measures such as material finishes, reduced lighting etc. can be implemented, it is difficult to fully determine the suitability given that the design is not finalised. The built form by virtue of its significant scale would be visually prominent and there are resultant adverse impacts on landscape character. The proposal would also impact on the landscape as a result of increased aircraft movements and resultant vapour trails and impacts on tranquillity. The robustness of the assessment has been raised as a concern in the LIR.
- 2.10 Overall, landscape harm is an area of significant concern due to the impact on the surrounding landscape including public footpaths, designated landscape, recreational routes, and designated heritage assets.

### Noise and Vibration

- 2.11 Noise impacts would directly affect residents and businesses in Central Bedfordshire as a result of increased aircraft movements. Increased noise levels could have significant impacts on local residents leading to health issues as a result of sleep deprivation, lack of opportunity for peaceful enjoyment of the countryside leading to impacts on general well-being. The noise assessments are inadequate as they do not comply with UK aviation noise policy or emerging policy, use incorrect methodology and baseline data. A full assessment of the shortcomings is included in the LIR. The concerns regarding the assessment were raised during the statutory consultations in 2019 and 2022. The impact of noise is a significant concern.

### Traffic and Transport

- 2.12 The proposed development will impact on the strategic and local highway network, notably the rural settlements to the west of the application site (Slip End, Caddington, Woodside, Aley Green, and Pepperstock). There are also concerns regarding the impact of inconsiderate and inappropriate parking by airport passengers who leave their vehicles on local roads. The robustness

of the Framework Travel Plan, and the assumptions that feed into the public transport provision for the development, with related concerns regarding the GCG Framework is also a concern. A detailed assessment of the highway matters has been undertaken by the Council's Highway Development Management Team and is included as Appendix A.

#### Other Considerations

- 2.13 The LIR includes an assessment of the GCG Framework, Community First Fund and adequacy of the Development Consent Order. It is unnecessary to replicate these points, but it should be noted that clarification is sought, and concerns have been raised.

### **3 Conclusion**

- 3.1 Based on the foregoing and the information in the LIR it is concluded that the proposal would result in adverse impacts on landscape and visual receptors, cultural heritage, highways, health, noise and air quality. For each of these topic areas, concerns have been raised regarding the adequacy of the assessment. Mitigation measures have been identified but there are concerns regarding the suitability of these in light of the shortcomings of the assessments.
- 3.2 It is recognised that there would be benefits resulting from employment opportunities and some topic areas would have neutral impact. However, there are fundamental issues that weigh against the proposal. As such CBC cannot support the proposal due to the negative impact on the communities that live and work in the local area, which would be adversely affected by the proposed development.

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## MEMORANDUM

<b>From :</b>  Jethro Punter Highways Dev. Management Team Leader		<b>To :</b>  Caroline Macrdechian Senior Planning Officer	
<b>Please Contact :</b>  Jethro Punter	<b>Our Reference :</b>  <b>CB/23/00347/DCO</b>	<b>Your Reference :</b>	<b>Date :</b>  05 June 2023

**Application No:** CB/23/00347/DCO  
**Location:** London Luton Airport, Airport Way, Luton, LU2 9LY  
**Proposal:** Development Consent Order relating to - Proposed Expansion of London Luton Airport (increasing passenger capacity to 32 million, building a second terminal, and associated infrastructure)

Central Bedfordshire Council believe that the following highways and transportation issues should be considered through the examination of the DCO:

- provisions included in the draft DCO related to highways;
- the modelling and assessment process;
- the identified highway impact in the Central Bedfordshire authority area and approach to mitigation and
- the Green Controlled Growth approach to meeting sustainable travel mode share targets

These are areas which the authority will address in further detail at the relevant stages of the DCO process, but which are covered in summary below.

In light of these concerns detailed below Central Bedfordshire Council requests a specific hearing session on Surface Access.

### Draft DCO Wording and Provisions

The Council considers that there will be a need for negotiation on the matters set out in the draft

DCO regarding determination periods, maintenance arrangements, covering costs borne by the Local Authority and approval of detailed design of offsite mitigation schemes. The limitations of these rights need to be agreed and set out.

Taking into account that the works are currently at a feasibility level of design, and potential implications in terms of earthworks, signage, or further modifications to the junction designs themselves, some allowance for horizontal deviation would allow more comfort in terms of the deliverability of proposed schemes. It should be noted that there has not been any detailed review of the junction modelling or mitigation schemes proposed at this point, and as such there is also the scope that amended or more significant junction works might be found to be necessary through the DCO process. Part 1, 10 assumes consent for works to be undertaken outside of the normal S278 process, so there would need to be a greater level of certainty in terms of the design at the time of the DCO being considered and granted.

The notice and determination periods proposed under the draft Order would not give the authority sufficient time to review and approve the highways works in question, nor for any standard review process, such as the Road Safety Audit process to be undertaken. As such we would advise that:

1. Scheme designs are progressed to a level where the authority can review prior to the DCO hearings, including an initial technical review and safety audit.
2. That a longer notice and determination period is provided for within any DCO document, to allow for the necessary scrutiny and review process to be undertaken.
3. That a separate undertaking to cover the authority's reasonable costs in undertaking and such review, in implementing any necessary traffic orders, road closures, road space booking, and inspection of works is provided.
4. That a separate undertaking is provided to allow for an appropriate defect and maintenance period for any works undertaken as part of the DCO. (Currently Section 11 of the DCO confers ownership back to the LHA upon completion of the works).

Alternatively, the matters above should be covered within a separate legal agreement between the applicant and the Local Authorities, which is cross-referenced within the DCO.

Para 23: Surface access – refers to a Framework Travel Plan, which is also referred to within para 16: Interpretation but is not referenced elsewhere in the document. This appears to be an error as para 16: interpretation states that the Framework Travel Plan is referenced in Schedule 8 as a certifiable document. Considering the importance of the plan to the overall surface access strategy, the DCO should include details of the process for agreement, implementing, and reviewing the document.

Para 25: The 8-week period stipulated may not be sufficient for the discharging authority to carry out the consent, agreement, or approval process in question. There is no undertaking to reimburse the Highway Authority for its reasonable costs in discharging any of the activities detailed, including checking and approving plans, inspecting works, or booking road-space / providing consents. An additional undertaking to this effect should be included.

There is no mechanism within the DCO for works not included within the redline to be delivered. For example, when addressing offsite impacts in locations such as Caddington and Slip End. The Council have previously raised concerns over impacts in these locations, related to both traffic displacement and parking impacts, and a mechanism for addressing these potential impacts, which sit outside the DCO redline, would need to be identified and agreed.



## **Modelling Assumptions – Core Scenario**

It is the view of the Council that the 'Core Scenario' does not represent the most likely forecast traffic situation. Rather that the assumptions within the sensitivity tests (No Smart Motorway and Local Plan Scenario) should be combined, as each is considered to be appropriate and necessary, to form an updated 'Core' model scenario which could be considered as more representative. In the absence of this, there will be a requirement upon the various authorities to consider and report upon a range of 'nested' sensitivity tests within the Local Impact Reports, which will be both time consuming, and unlikely to result in a position where a single set of metrics against which decisions can be made can be fully agreed.

The scenario in which the strategic network isn't improved is expected to have a differing impact upon the local highway network to that reported within the assumed 'Core' scenario, (affecting not just Central Bedfordshire but also the other local highway authorities) and the outcome of this work is a critical reference point for our own Local Impact Reporting.

It is also noted that the sensitivity testing carried out is limited to the final forecast year, 2043. The modelling work associated with the currently assumed 'Core' scenario identified differing, and sometimes greater levels of impact at the junctions within the study area during earlier forecast years, and it is therefore reasonable to expect the same with the sensitivity test scenarios. As such any revised 'Core' assessment should be undertaken for each of the forecast years and reflected in the detailed junction modelling work.

The impacts of re-routing on local roads needs to be fully articulated within any reporting of the tests undertaken. This should include updated junction modelling for impacted junctions, and the identification of additional mitigation if required. If inappropriate routing through local communities is identified, this should also be accounted for, and mitigated against.

## **Modelling Assumptions – Mode Share**

The base mode share assumptions appear to be based upon public transport usage recovering to levels above the 2018 CAA mode share, in which 24% of staff used public transport, but with 2020 levels recorded at 5%. Likewise, the 2018 passenger mode share was recorded as being 33%, with the 2020 survey recording combined public transport mode share of 9%. As such the baseline 2027 level of 40% passenger public transport mode share appears to be similarly optimistic.

At present, outside of the DART proposals, which predominantly provide for more efficient rail interchange rather than adding new connecting services, there is a lack of investment in public transport. In particular, consistent concerns have been raised over the assumption that public transport providers will respond to any demand generated by the expansion, rather than the proactive promotion of sustainable transport by providing new or improved services. It is noted that Stansted Airport has been used as a comparison within the submission documents. In the case of Stansted, it is understood that public transport improvements are partially funded by a passenger transport levy, which contributes circa £600k-£800k per annum to public transport measures. There appear to be no comparable proposals associated with the DCO.

A reliance upon a commercial market response to public transport demands also means that there is no overarching strategy to manage and coordinate public transport provision.

As such, the Council would continue to express concerns over the robustness of the base and forecast mode share assumptions which underpin the wider modelling work.

## **Modelling Assumptions – East Luton Schemes**

The forecast baseline modelling is reported as including a number of significant highways improvements schemes, adding capacity to both links and junctions. Whilst some of these works are detailed as having funding in place and being programmed for delivery, the works were originally proposed to be complete by March 2021, during which time construction costs have significantly increased. It is therefore unclear whether the works in question can still be relied upon within the baseline. The documents confirm that only one of the schemes so far has been implemented (A505 Stopsley Way/A505 Vauxhall Way junction upgrade) and does not outline the status of the other 9 schemes that form this package of measures.

It is noted, for example, that ARUP mitigation drawing reference LLADCO-3C-ARP-SFA-HWM-DR-CE-0034 Rev PO1 details a major signalisation scheme at the junction of Crawley Green Road with Vauxhall Way as the assumed baseline level of mitigation at this junction (delivered by the East of Luton Study), whereas the Strategic Modelling forecast report (under table 3.3: Forecast Infrastructure Assumptions), states that ‘signalisation was initially considered... but rejected in favour of localised widening at the roundabout.’ As such there appears to be a mismatch between the plans submitted showing assumed levels of committed infrastructure in the forecast years, and that which may be delivered, which could have significant effects upon the wider modelling work undertaken.

As the DCO is not proposing the delivery of the works in question, it is also unclear how these works could be relied upon within any decision without being included as specific consent order requirements, notwithstanding a wider and related concern that the inclusion of these schemes in the forecast baseline means that trigger points for provision cannot be identified. It is also unclear, where the DCO is proposing works which build upon, or modify, schemes assumed as delivered under the East of Luton project, how these would come forward in the absence of the wider underlying scheme.

The Council continue to have concerns over the relationship between the Strategic (CBLTM) and the VISSIM model, and the derivation of flows for the detailed junction models used to develop proposed mitigation schemes. If there has been a direct application of turning movements from the strategic or microsimulation models to individual junctions, then validation against turning movements in the base year would need to be demonstrated at an individual junction level, if there is to be sufficient confidence in the junction modelling undertaken. The Council have requested sight of the more detailed junction modelling undertaken on a junction-by-junction basis, using LINSIG, JUNCTIONS 9 or other specific junction modelling software, including full model inputs and outputs, to allow for an appropriate level of scrutiny and review to be undertaken and for a comparison between scenarios to be possible. In the absence of this more detailed information, it is not possible for the Council to review or fully comment upon the proposed mitigation.

## **Wider Impacts**

The Council are concerned that the detailed modelling requested and reported within the submitted Transport Assessment (Document refs APP-200-206) identified several of the junctions as forecast to be operating significantly over capacity; but note that these locations were not identified within the initially provided wider modelling work as being areas of concern or predicted congestion. This may be due to the use of Link V/C rather than junction V/C metrics. The Council would therefore request that junction approach V/C metrics are provided alongside the link metrics, to ensure that areas of impact at specific junctions within the Central Bedfordshire network are not missed. This

may result in the requirement for further detailed junction assessments.

This would also relate to the junctions on routes running parallel to the M1 to the east, on the A1081 and B563. Whilst the summary information provided within the Transport Assessment (Document refs APP-200-206) suggests a limited change in total two-way flow, there appears to be a more significant change in terms of tidality, particularly when looking at the link flow data provided for the links to the north and south of the B653 / West Hyde Road crossroads, which could impact upon the operation of the associated junction/s.

The levels of predicted delay and queuing currently detailed within the Transport Assessment (Document refs APP-200-206) at these offsite locations would not be considered acceptable (with Chaul End for example experiencing increases in queuing in the PM peak from 59 to 167 vehicles following the addition of development traffic, with similar levels of increase in the Luton Road approach), and an increase in average junction delay from 263 seconds to 939 seconds. Significant increases in queuing are also predicted at the Newlands Road / Luton Road / Farley Road junction. The Council would therefore request further investigation into mitigation options (and associated costings) for both these locations and for this mitigation to be embedded in the DCO itself.

### **Details of Highways Works**

The Council have consistently raised concerns that the highways works, including those within Central Bedfordshire have not been discussed in any detail with the authority, with regards to either the details of the junction modelling informing the designs or the checking of the proposed mitigation schemes, which to date have not been subject to any Safety Audits.

As raised within our comments upon the content of the Draft DCO, the proposed wording provides significant powers to the applicant to deliver highways works, and therefore there is an associated requirement for the local highway authorities to be satisfied, as far as possible, that the highways works are appropriate, safe and deliverable. At present the level of detail is not considered to be sufficient to allow for this.

Also as outlined previously, due to the lack of supporting base model validation, individual junction models, and technical or safety audits or reviews of the proposed schemes, there remains the potential that the schemes in question could change, with the redline boundary drawn relatively close to the schemes in question, raising further concerns that there is insufficient flexibility within the redline to accommodate changes. The phasing of highway mitigation associated with the Surface Access Strategy has also not been agreed, with some mitigation works (for example the London Road South improvement works) being held back to later phases despite earlier impacts being identified in the modelling work.

### **Offsite Parking**

Inappropriate and inconsiderate parking in residential roads in Central Bedfordshire is already an issue, most notably within the settlements of Caddington and Slip End, where there have been frequent examples of airport passengers parking on residential roads for significant lengths of time, having taken a taxi to the airport. Mitigation in the form of parking controls would therefore be necessary as part of any future expansion proposals. It is noted that areas of concern in Luton are highlighted for potential controls or restrictions (DCO document ref TR020001/APP/4.13). The Council are of the view that this concern could feasibly be dealt with through the DCO by extending the parking control areas to Caddington and Slip End and similar plans provided accordingly, including an associated commitment to the costs of local engagement, management, and

enforcement.

There is a related concern that parking demands above those predicted could be realised if the mode share targets are not achieved, and that the additional parking demand would be generated at off-site locations. There may be increased pressure for long term parking provisions in the surrounding areas, and the implications of this need to be considered.

The Council are of the view that the parking assumptions applied, which subsequently feed through to the car driver mode share within the modelling work, and in particular the lack of allowance for any increase in demand for off-site car parking, may underestimate the wider traffic impacts of the expansion, particularly on routes more remote from the airport.

### **Green Controlled Growth**

The Council are concerned that, whilst the proposal seeks to provide physical infrastructure to support sustainable transport modes, and this is welcomed, there is concern that the anticipated 45% sustainable transport modal shift may not be fulfilled due to a lack of related investment in services. There are numerous external factors that underpin the scope to fulfil this such as reliance on third parties i.e.: bus and rail operators to provide increased capacity to meet demand.

The approach assumes that public transport operators will provide increased capacity in response to the SAS [TR020001/APP/7.12]. This applies to bus, coach, and rail travel. It is not considered that reliance upon commercial operators to meet demand is an appropriate strategic approach to public transport access. In the absence of evidence to substantiate demands for individual route enhancements, it is unclear how improvements would be brought forward.

Whilst reference is made to a 'toolbox' approach, this is not currently a funded or defined process, nor is there a mechanism for the prioritisation of investment between geographical areas, modes of transport, or means of intervention. The use of terms such as 'explore' and 'consider' would carry little planning weight, as they provide no measurable commitment to implement or fund.

It is unclear why there are no initial targets in the Framework Travel Plan, which it would be expected would accord with the modelling assumptions (as a minimum starting point). Alongside this, there appears to be no funding commitment associated with the Travel Plan.

The only metric being applied is mode share, as self-reported through passenger and staff surveys. This should be supplemented by empirical data, such as surveys of vehicle numbers entering and exiting the site during peak periods and / or daily. It is understood that the Framework Travel Plan is likely to collect a more detailed set of metrics, and it is the view of the Council that this should feed into the Green Controlled Growth process.

It appears that controls don't apply if failure is for reasons outside the airport operator's control, as such further expansion is required on this wording to indicate what would be considered outside of the operator's control, for example passenger mode of travel.

It is acknowledged in the supporting documents that the ESG will impose a cost on Local Authorities but there is no detail on how the supporting technical groups will be funded to ensure an appropriate level of independent technical scrutiny that some Local Authorities may not be able to offer.

There needs to be further clarity on the thresholds for intervention, the measures that will be introduced if targets are not met and what sanctions are available and how this would be linked to

minimising further impacts of the breach in question.

As requested by the Planning Inspectorate, please also see below for a summary of areas where there is an area of disagreement between Central Bedfordshire Council (CBC) and the applicant team. This is not intended to be exhaustive, but rather to highlight the main areas of concern, considered significant enough to bring to the Inspectors attention at this early stage in the process and in advance of the scheduling of hearing sessions.

Area of Disagreement	Description of concern	Actions to mitigate / address
Sustainable Transport Mode Share	<p>The base mode share assumptions appear to be based upon public transport usage recovering to levels above the 2018 CAA mode share, in which 24% of staff used public transport, but with 2020 levels recorded at 5%. Likewise, the 2018 passenger mode share was recorded as being 33%, with the 2020 survey recording combined public transport mode share of 9%. As such the baseline 2027 level of 40% passenger public transport mode share appears to be similarly optimistic.</p> <p>It is not considered that reliance upon commercial operators to meet demand is an appropriate strategic approach to public transport access or achieving the public transport targets relied upon within the modelling work. In the absence of evidence to substantiate demands for individual route enhancements, it is unclear how or if improvements would be brought forward.</p> <p>Whilst reference is made to a 'toolbox' approach, this is not currently a funded or defined process, nor is there a mechanism for the prioritisation of investment</p>	<p>Taking the example of Stanstead – public transport improvements are partially funded by a passenger transport levy, which contributes circa £600k-£800k per annum to public transport measures. There appear to be no comparable proposals associated with the DCO.</p> <p>Without an identified framework for funding and delivering sustainable transport connections to and from the airport, then the Council would continue to question how achievable the mode share targets are, and how much reliance can be placed upon them when considering the DCO.</p>

	<p>between geographical areas, modes of transport, or means of intervention.</p> <p>The use of terms such as 'explore' and 'consider' would carry little planning weight, as they provide no measurable commitment to implement or fund</p>	
<p>Core modelling scenario</p>	<p>The Council have a number of significant concerns with regards to the 'Core' modelled scenario, which have been laid out in our representations to date:</p> <ol style="list-style-type: none"> <li>1. The assumed inclusion of a Smart Motorways improvement on the M1, which is not programmed or funded, and following the Governments announcement on Smart Motorways, now certain not to happen.</li> <li>2. The assumed inclusion of East of Luton highways schemes, including major junction works and dualling of Vauxhall Way, without confirmation of the funding or delivery programme for the schemes in question. By including these in the base scenario it is also not possible to determine the degree to which the airport expansion is reliant upon their delivery, or the point in time when they would be required.</li> </ol>	<p>The agreement of an updated and more representative 'Core' scenario, most likely formed as a combination of the 'no Smart Motorways' sensitivity test and the 'Local Plan sensitivity test' and then applied as an uplift to the VISSIM modelling. Also feeding through to the detailed junction modelling (including those junctions outside of the VISSIM modelled area).</p> <p>This would need to include clarity on the infrastructure assumptions within each forecast year, and a realistic phasing of assumed infrastructure in the base and with development scenarios.</p>

	<ol style="list-style-type: none"> <li>3. The separate reporting of the 'Local Plan' scenario, which is considered to be the more robust forecast, with limited outputs and metrics.</li> <li>4. The separate reporting of the scenario in which the VISSIM model cordon is uplifted to match the strategic model flows, with limited outputs and metrics.</li> <li>5. The inclusion of Century Park within the 'with development' scenario, despite not forming part of the DCO application.</li> </ol>	
Assumed infrastructure	<p>As with the concerns raised with regards to the content of the 'Core' scenario – The Council have specific concerns over the inclusion of infrastructure within the forecast scenarios without certainty over funding, phasing, or delivery. This includes:</p> <ol style="list-style-type: none"> <li>1. M1 Smart Motorways</li> <li>2. East of Luton Highways schemes, including the dualling of Vauxhall Way</li> </ol> <p>These infrastructure assumptions are sufficiently closely related to the traffic study area as to directly influence traffic routing, and as such should be limited to those where delivery within specified timescales, by either the DCO promoter or others can be ensured.</p>	<p>There would need to be either certainty over the programming, funding, and delivery of the schemes in question from third parties, or a commitment through the DCO process to deliver the schemes in question. This would need to be associated with additional supporting transport work to determine the point within the phased delivery of the DCO project when these works are required, allowing appropriate controls to be imposed through the DCO process.</p>
Lack of detail on proposed	The Council have consistently	

mitigation – and associated redline boundary concerns

raised concerns that the highways works within Central Bedfordshire have not been discussed in sufficient detail with the authority, with regards to either the details of the junction modelling informing the designs or the checking of the proposed mitigation schemes, which to date have not been subject to any Technical checks or Safety Audits. Whilst the applicant team have referred to Safety Audits being undertaken after the conclusion of the DCO process, this is not considered to be appropriate, with GG119 stating that *'Stage 1 RSA should include road safety matters which have a bearing upon land take, licence or easement before the draft orders are published or planning consent is applied for.'* As such it is considered that the appropriate point in the process for a Stage 1 RSA to be required is prior to the full consideration of the DCO and related hearings. The proposed DCO wording provides significant powers to the applicant to deliver the highways works proposed, and therefore there is an associated requirement for the local highway authorities to be satisfied, as far as possible, that the highways works are appropriate, safe and deliverable. At present the level of detail is not considered to be sufficient to allow for this. As outlined above, due to concerns over some of the base modelling, and the lack of technical or safety audits or reviews of the proposed schemes, there remains the



	<p>potential that the schemes in question could change, with the redline boundary drawn relatively closely to the schemes in question, raising further concerns that there is insufficient flexibility within the redline to accommodate changes.</p>	
<p>Lack of mitigation at local junctions outside of the VISSIM modelled area/s</p>	<p>We are concerned that the detailed modelling requested by the Council identified several of the junctions in question as forecast to be significantly over capacity; but note that these locations were not identified within the initially provide wider modelling work as being areas of concern or predicted congestion. This may be due to the use of Link V/C rather than junction V/C metrics within the TA.</p> <p>In addition, where impacts have been identified, no mitigation had been proposed, despite the level of impact being significant. Taking the example of the Chaul End Road / Luton Road junction average delay is predicted to increase from 263 seconds to 939 seconds as a result of DCO related traffic.</p>	<p>The Council would therefore request that junction approach V/C metrics are provided alongside the link metrics, to ensure that areas of impact at specific junctions within the Central Bedfordshire network are not missed. This may result in the requirement for further detailed junction assessments.</p> <p>Where DCO traffic related impacts at junctions within Central Bedfordshire are identified, appropriate mitigation schemes should be proposed and secured via the DCO process.</p>
<p>Off site parking</p>	<p>The Host Authorities raise concern that the parking demands above those predicted could be realised if the mode share targets are not achieved, and that the additional parking demand would be generated at off-site locations. There may be increased pressure for long term parking provisions in the surrounding areas, and the implications of this need to be</p>	<p>The only way this could feasibly be dealt with through the DCO is planning for parking control areas to be extended to Caddington and Slip End and plans provided accordingly. Including a related financial commitment to support ongoing monitoring and management.</p>

considered as part of the Application for development consent.

This concern relates to both formal 'off-site' car parking, which already provides for a large proportion of the existing Airports parking, but which has not been modelled as expanding in line with the increases in all other modes of access, and also informal 'fly-parking' in existing communities, which would be outside of the host authorities ability to control through the planning system.

Whilst it is within the gift of local authorities to implement policies that control parking, this has cost and timescale implications, which the Host Authorities would not face in the absence of the proposed DCO. This adds a further burden in terms of the Authorities' network management duties.