

**Summary of Representations made at ISH4 submitted by National Highways Limited**  
**Application by London Luton Airport Limited for an Order granting Development Consent for the**  
**London Luton Airport Expansion Project**

**Planning Inspectorate Reference Number: TR020001**

## **1. Welcome, introductions, arrangements for the hearing**

- 1.1 Ross Corser (Solicitor), Jeremy Bloom (Transport Consultant), Fiona Ahmed (Transport Consultant) and Kelly Milburn (Spatial Planning Manager) appeared on behalf of National Highways Limited.

## **2. Matters arising from the supplementary agenda**

- 2.1 N/A

## **3. Transport Modelling in the Transport Assessment**

- 3.1 National Highways has a number of concerns with the Applicant's transport modelling in the Transport Assessment, which are summarised as follows.
- 3.2 The Vissim model does not comply with TAG demand forecast guidance and is not based on outputs from the strategic (Saturn) modelling – the strategic model and the micro simulation model flows are not the same.
- 3.3 The traffic routing has not been prepared and checked in line with TAG guidance which introduces an element of uncertainty in the modelling results.
- 3.4 National Highways has not seen a “without development” scenario that isolates the impact of the development trips and therefore the impact of the development and the phasing is obscured.
- 3.5 The 2043 models grid lock, preventing a quantitative comparison between the “with” and “without” development scenarios.
- 3.6 The Transport Assessment in the core scenario includes a non-committed All Lane Running Smart Motorway scheme that is not compliant with TAG guidance. It also distorts and misleads the understanding of the transport and environmental issues in the DCO as the Transport Assessment and Environmental Statement are based on surrounding highway infrastructure that will not be delivered.
- 3.7 The modelling undertaken to date shows that the merges and diverges on the north and southbound slips exceed capacity even in 2027.
- 3.8 National Highways welcomes the updated traffic modelling commissioned by the Applicant (to be presented in December 2023) and will be particularly interested to see the impact of the removal of the All Lane Running scheme from the core scenario. It is disappointing that National Highways' recommendation for earlier constructive dialogue on issues concerning the strategic road network were not accepted by the Applicant, as we are now in a position where there will be very limited time to understand the results of the updated modelling and grapple with the precise nature of the mitigation required to the strategic road network.

#### **4. Off Site Highway Work**

- 4.1 The Applicant's traffic (Vissim) modelling is not agreed by National Highways and is in the process of being updated. Until it is updated, we cannot confirm whether the mitigation to the slip roads will be needed for Phases 1 and 2a. To preserve National Highways' position in light of the current traffic modelling assumptions (including All Lane Running that will not be delivered), our position is that the mitigation to the slip roads will be needed prior to opening of Phases 1 and 2a. As a result, Road Safety Audits should be carried out on designs inclusive of mitigation to the slips in accordance with Department for Transport Circular 01/2022 and DMRB guidance, which both state that a Road Safety Audit should be undertaken prior to a planning consent being submitted.
- 4.2 Due to the recent change by the Applicant to exclude the All Lane Running scheme from the traffic modelling, it is not clear what mitigation is being proposed for phase 2b of the M1 Junction 10 works. Phase 2b currently shows improvements to the slip roads, however this proposed mitigation would tie into the All Lane Running scheme, which is no longer being delivered. National Highways is unclear whether the mitigation for phase 2b no longer includes the slip road mitigation. If this is removed, then the Vissim modelling will need to be updated to confirm the impact of the reduction in capacity on the slip roads.
- 4.3 There are key items of highway mitigation that have not been secured – for example, the signage strategy and placement of gantries and the location of a maintenance bay. The Applicant has provided no details on the design of these items, which National Highways requires now in order to confirm that the relevant items can be delivered within the order limits. The Applicant is requested to provide assurances as to the design of these items, their location and legally binding commitments as to delivery.
- 4.4 National Highways will issue Technical Note M1J10\_TN\_01 Final to the ExA, which sets out the extent of further mitigation required on the slip roads at M1 Junction 10 to mitigate the forecast congestion and provides a high level design solution. This information was issued to the Applicant's consultants on 13 September 2023.

#### **5. Parking**

- 5.1 It is noted that additional coach, taxi and car parking drop off/parking spaces are being provided as part of the authorised development. The application indicates that the requirements for the number of spaces is calculated based on Civil Aviation Authority (CAA) passenger mode share data. Future details of the numerical analysis indicating how the demand for spaces/drop offs has been derived without any existing car park utilisation surveys is requested. Also, further details of how the CAA data has been used to derive the future car parking demand and how this relates to the passenger trip generation is requested.

- 5.2 The matter of “fly-parking was raised” at the hearing by other interested parties. National Highways is keen to understand how this has been accounted for in the demand forecast for surface access given the potential implications for M1 Junction 10.

## **6. Monitoring**

- 6.1 National Highways has not yet seen the full TRIMMA. The outline TRIMMA does not provide sufficient details of the monitoring regime. The Applicant is requested to provide the full TRIMMA as a matter of urgency.
- 6.2 The Applicant proposes to stop monitoring at 31.5mppa. National Highways does not agree to this as for a development of this scale, monitoring should continue for several years post full occupation to confirm that the impacts do not change over time.
- 6.3 The Sustainable Transport Fund stops once airport capacity reaches 32mppa. National Highways consider that at this stage the mode share is likely to change resulting in a greater number of car trips. Monitoring is required for longer than the 32mppa capacity point in order to confirm that the impacts on the strategic road network do not change once funding for sustainable transport interventions is reduced or ends.
- 6.4 The Applicant is requested to provide details of how it will distinguish between airport and non-airport related traffic for the purposes of monitoring.
- 6.5 The Applicant is requested to provide details of how junction capacity will be monitored.
- 6.6 The Applicant is requested to provide details of how the thresholds triggering a requirement for additional mitigation should be monitored and secured (e.g. through the Environmental Scrutiny Group or otherwise).
- 6.7 National Highways consider that monitored for a period of 1 week for a development of this size is insufficient and that fluctuations may occur week by week. Monitoring for at least 1 month should be undertaken to ensure that the surveys represent a neutral, average time period.
- 6.8 National Highways requests that it be invited to participate in the Airport Transport Forum as a statutory consultee with functions relevant to surface access.

## **7. Sustainable Transport**

- 7.1 N/A

## **8. Framework Travel Plan**

- 8.1 National Highways considers that monitoring of the Travel Plan targets every five years is too infrequent as there could be significant changes in mode share and the targets should be monitored more frequently. National Highways seeks to discuss

with the Applicant and the Local Authorities to confirm the frequency for the review of the targets.

## **9. Green Controlled Growth – Surface access mode share**

- 9.1 National Highways notes the inclusion of the Green Controlled Growth Framework in the Environmental Statement (Application Document Ref: TR020001/APP/7.08) and is considering this alongside the existing suite of requirements in the draft DCO (Application Document Ref: TR020001/APP/2.01) from the perspective of surface access. We reserve our position on the Green Controlled Growth plan but note that any commitments to green controlled growth will need to be legally enforceable and National Highways will need to be confident that where issues of surface access arise from exceedance of thresholds, the views of National Highways will be taken into consideration and a control on further growth will be in place until surface access issues are resolved.
- 9.2 National Highways requests confirmation from the Applicant that the controls on airport expansion beyond the permitted thresholds will be legally enforceable by National Highways.
- 9.3 National Highways also notes that the percentage mode shares across the Green Controlled Growth Framework and the mode shares in the Travel Plan and Transport Assessment are not consistent. The Applicant is requested to clarify how the surface access limits and thresholds have been developed for the Green Controlled Growth Framework.

## **10. Action points arising from the hearing**

- 10.1 N/A

## **11. Any other business**

- 11.1 N/A

## **12. Close of hearing**

- 12.1 N/A