

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	Luton Rising's Response	National Highways Response
National Highways RR-1076	SOCG	<p>National Highways has met regularly with the Applicant's surface access transport consultants during the pre- application period and substantial progress has been made in understanding the modelling approach and outputs. This has enabled National Highways to understand the impacts of the proposed Development on the SRN and the adequacy of the proposed design of mitigation works at M1 Junction 10.</p> <p>However, a number of matters remain unresolved, and we have not yet received an agreed Statement of Common Ground, despite requesting this for the past twelve months.</p>	<p>Noted.</p> <p>The National Highways SoCG is currently being updated, with the initial draft SoCG being submitted at Deadline 2.</p>	<p>This was submitted as a unilateral agreement at deadline 2. Discussions are ongoing with the Applicant to agree the SOCG.</p>
National Highways RR-1077	Principal concerns	<p>National Highways' principal concerns requiring resolution can be summarised as follows (see 1-5 below):</p>	<p>Noted.</p> <p>Please refer to specific responses below.</p>	<p>No comment</p>
National Highways RR-1076	Traffic and Transportation	<p>1. The design of the mitigation at M1 Junction 10 to enable the SRN to operate safely and effectively is acceptable, as far as it goes. However, some additional works are believed by National Highways to be required to enable safe operation.</p>	<p>Noted.</p> <p>Luton Rising continues to engage with National Highways on the impacts and design of Junction 10.</p>	<p>National Highways has presented information to the applicant which sets out that National Highways consider that further mitigation is required on the slip roads at M1 Junction 10 to mitigate the impacts of Luton Airport Expansion. This is set out in National Highways' Technical Note M1J10_TN_01 Final and was issued to the Applicant's consultants on 13/09/23. This matter is ongoing.</p>

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National Highways RR-1076	Protective provision	<p>2 Protective provisions have not yet been discussed, although National Highways sent a draft proposal to the Applicant before the DCO application was submitted.</p> <p>It is essential that these are agreed and formalised to ensure that National Highways is able to discharge its duties under the License on behalf of the Secretary of State, particularly in respect of highway safety and commercial matters.</p>	<p>The Applicant is in ongoing discussions with National Highways to address matters raised in its Relevant Representation.</p> <p>Draft protective provisions have been received and are under review.</p>	<p>A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.</p>
National Highways RR-1076	Traffic and transportation	<p>3. The potential impact of the (Proposed) Development on adjacent junctions and parallel routes, due to diverting traffic as a consequence of congestion, is not yet fully understood.</p>	<p>The Applicant understands that there is potential for some redistribution of vehicular trips around the local highway network as a result of the Proposed Development. Any significant impacts have been identified through detailed modelled assessments and mitigation proposed.</p> <p>More details are provided in the Transport Assessment [APP-203 to APP-206].</p>	<p>As set out below in National Highways detailed comments further information is required on the traffic modelling.</p>
National Highways RR-1076	Traffic and transportation	<p>4. The proposal for a traffic monitoring regime to determine the timing of the phasing of implementation works requires further details in terms of its operation and application.</p>	<p>Noted.</p> <p>The ongoing development of the Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) will set out additional detail on the proposed monitoring regime.</p>	<p>At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation;</p> <ul style="list-style-type: none"> Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue

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				<p>for several years post full occupation to confirm that the impacts do not change over time</p> <ul style="list-style-type: none"> • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National Highways time to attend meetings. Given the comprehensive nature of the monitoring this is labour intensive and National Highways does not have the resources to fund monitoring for developers schemes • Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends • Details of how the Applicant will distinguish between airport and non-airport related traffic is required. • Details of how junction capacity will be monitored is required, ie how will the Applicant confirm

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				<p>that the mitigation that they have put in place for the SRN is effective</p> <ul style="list-style-type: none"> • Details of how the triggers/thresholds for mitigation should be confirmed • Surveying for only one week for a development of this size is nowhere near sufficient. There can be significant fluctuations week by week, several weeks should be undertaken as a minimum to ensure that the surveys represent a neutral, average time period • It is unclear how the voting process will work for mitigation. Will the LA's be voting for whether mitigation is required on the SRN and National Highways voting for mitigation on the LRN? This is illogical as each consultee has their own concerns

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National Highways RR-1076	Traffic and transportation	5. Construction impacts on the SRN are not sufficiently understood and further detail is required in respect of how they will be managed.	<p>The Applicant sets out the proposed construction traffic volumes, management measures and vehicle routing in detail in Section 13 of the Transport Assessment [APP-206].</p> <p>All construction traffic was assumed to access the airport via the M1 and A1081 New Airport Way. A Construction Impacts on Strategic Road Network (SRN) Technical Note has been submitted to National Highways (NH) and subsequent comments from NH have been closed out. The Construction Traffic Management Plan (CTMP) would be worked up in more detail at the construction planning stage when more detailed information is known.</p>	National Highways does not fully understand the impacts of the construction traffic without ALR included in it. It is our expectation that without ALR there is likely to be more traffic using M1 Junction 9. Further details on this is required from the Applicant as soon as possible and well in advance of the close of the Examination so that the updated modelling can be addressed with the ExA and mitigation required secured through the development consent order.
National Highways RR-1076	Traffic and transportation	<p>These issues are set out in detail in Annex A of National Highway's letter, which responds directly to the application documents. Annex B responds directly to the (Examining Authority's) Rule 9 letter dated 16 May2023.</p> <p>We note that, in its further Rule 9 letter dated 13 June 2023, the Examining Authority requested that the Applicant engages with stakeholders, including National Highways, to agree an appropriate methodology for modelling Covid-19 impacts on demand if the transport model is not to be rebased. As this has not been raised with</p>	<p>Following the Examination Authority's (ExA's) request in the Rule 9 letters of 16 May and 13 June 2023, the Applicant is engaging with National Highways (NH) and other key stakeholders on the ExA's requirements and the proposed approach.</p> <p>This will include on-going engagement throughout the process.</p>	National Highways has presented information to the applicant which sets out that National Highways consider that further mitigation is required on the slip roads at M1 Junction 10 to mitigate the impacts of Luton Airport Expansion. This is set out in National Highways' Technical Note M1J10_TN_01 Final and was issued to the Applicant's consultants on 13/09/23. This matter is ongoing.

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		National Highways, we assume that the model will be rebased.		
National Highways RR-1076	Traffic and transportation	National Highways is not yet satisfied that neither the mitigation proposed, nor the timing of delivery, is adequate to deal with the additional pressures arising from the proposed expansion of Luton Airport NH is keen to resolve the concerns raised within this Relevant Representation to enable the development to proceed, whilst safeguarding the safe operation of the SRN.	Noted. The Applicant has continued to engage with National Highways (NH) to address these concerns since the submission of the DCO application and will continue to do so.	NH has presented information to Luton Rising which sets out that NH believe that further mitigation is required on the slip roads at M1 Junction 10. This is set out in M1J10_TN_01 Final and was issued to the Applicants consultants on 13/09/23. This matter is ongoing.
National Highways RR-1076	General	<p>DETAILED NATIONAL HIGHWAYS RESPONSE TO LONDON LUTON AIRPORT EXPANSION DEVELOPMENT CONSENT ORDER APPLICATION 23 JUNE 2023 SUMMARY</p> <p>Issues identified during the review of the DCO documents are presented according to the categories in the table below.</p> <p>Categorisation of Review Comments</p> <p>Category Observations - are points for consideration on an issue that would not significantly affect model operation or output.</p> <p>Comments - which may identify particular assumptions, technical approaches or guidance references which may be deemed inadequate but may not influence the result of the analysis. The main function is to highlight such issues for attention in subsequent project stages, or for future projects. substantive issues - which are</p>	Noted.	No Comment

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		material issues for National Highways and the SRN that require corrective action.		
National Highways RR-1076	Traffic and transportation	Transport assessment - chapters 1 and 8 The approach and trigger points for monitoring should form part of a condition for the DCO application as this is critical to the timing of infrastructure delivery – substantive issue	Noted. Whilst the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) as set out in Appendix I of the Transport Assessment [APP-202] sets out the principles for ongoing monitoring, the TRIMMA is being developed in more detail that will set out the triggers and approach. This will be shared with National Highways in due course and prior to examination.	Noted. The TRIMMA should include a significant amount of additional detail in order to give National Highways comfort that the impacts of the Luton Airport expansion on the SRN will be monitored to determine that the SRN is still operating safely and efficiently. At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation; <ul style="list-style-type: none"> • Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue for several years post full occupation to confirm that the impacts do not change over time • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National Highways time to attend meetings. Given the comprehensive nature of the monitoring this is labour intensive and National Highways

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				<p>does not have the resources to fund monitoring for developers schemes</p> <ul style="list-style-type: none"> • Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends • Details of how the Applicant will distinguish between airport and non-airport related traffic is required. • Details of how junction capacity will be monitored is required, ie how will the Applicant confirm that the mitigation that they have put in place for the SRN is effective • Details of how the triggers/thresholds for mitigation should be confirmed • Surveying for only one week for a development of this size is nowhere near sufficient. There can be significant fluctuations week by week, several weeks should be undertaken as a minimum to

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				<p>ensure that the surveys represent a neutral, average time period</p> <ul style="list-style-type: none"> It is unclear how the voting process will work for mitigation. Will the LA's be voting for whether mitigation is required on the SRN and National Highways voting for mitigation on the LRN? This is illogical as each consultee has their own concerns
National Highways RR-1076	Traffic and transportation	Transport assessment -chapter 4,9,10.It should be noted that a smart motorway (ALR) as part of capacity enhancements in this area of the SRN will no longer be an option – substantive issue	The Applicant undertook scenario testing in Chapter 14 of the Transport Assessment [APP-206]. This considered the impacts of the Proposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded in the sensitivity test the mitigation strategy continues to mitigate the impacts of the scheme.	<p>It is noted that the Applicant is re basing the strategic model and VISSIM model to exclude ALR. This approach is welcomed by National Highways.</p> <p>Further clarification is sought on the revised mitigation proposed for the M1 J10 particularly the slip roads as the mitigation proposed assumed that in Phase 2b ALR would be in place prior to 2043. National Highways will continue to engage with the Applicant to agree the strategic and VISSIM modelling.</p>
National Highways RR-1076	Traffic and transportation	Transport assessment - chapter 4. Reference should also be made to the new Department for Transport Circular 01/2022, which needs to be applied – substantive issue	Noted. The new Circular requires that new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable. The airport currently has a bus	In relation to the proposed mitigation for the M1 Junction 10. The following paragraph of the Department for Transport Circular 01/2022 should be noted;

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			<p>interchange and the Luton DART which provide access to a comprehensive network of bus and rail services. As such, and considering the mode share targets which have been set, we consider that the aims of the Circular have been taken into consideration.</p> <p>The Applicant aims to build on the existing provision in the Proposed Development with an extension of the Luton DART to Terminal 2, a new additional bus and coach station at Terminal 2 and restricted growth in car parking spaces which will be supported by Travel Plans. Through the GCG Framework [APP-218] proposals, the Applicant is committed to a series of clearly specified 'Limits' for the lifetime operation of the airport.</p>	<p><i>'29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy. And</i></p> <p><i>52. The scope and phasing of necessary transport improvements will normally be defined by the company in planning conditions that seek to manage development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a</i></p>

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				<p><i>funding agreement between the development promoter and the company.'</i></p> <p>This is particularly pertinent in relation to National Highways position on the additional mitigation that is required to the M1 Junction 10 slip roads.</p>
National Highways RR-1076	Traffic and transportation	<p>Transport assessment -chapter 5. Are there any car park capacity / utilisation surveys available that provide evidence that this level of car parking is currently fully utilised?</p> <p>Comment</p>	<p>The Applicant does not have peak time car park demand data for 18mppa. However, car park surveys were undertaken in October 2017 to determine arrival / departure profiles and occupancy levels at the various on-site car parks, and these can be discussed with NH as part of our ongoing collaboration.</p>	<p>Can the car park utilisation survey data be shared with National Highways?</p>
National Highways RR-1076	Traffic and transportation	<p>Transport assessment - chapter 5. Further analysis would enable NH to understand whether the staff arrival and departure pattern aligns with that of the highways network. Information to be provided on the arrival and departure profile of HGV and LGV deliveries.</p> <p>Comment</p>	<p>Table 9.8 within Chapter 9 of the Transport Assessment [APP-204] sets out the baseline and future year trip generation for staff, and Table 9.9 sets out the AM and PM peak HGV/LGV flows for all with development scenarios. However, an arrival and departure profile across the entire day for both modes have not been created, as the modelling exercise is focused on the typical highway peak periods.</p>	<p>Due to the rebasing of the modelling to support this DCO Application, National Highways understands that ALR is being removed from the modelling.</p> <p>Further clarification is sought on the revised staff and passenger forecasts and their phasing and what the impact of</p>

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National Highways RR-1076	Traffic and transportation	Transport assessment - chapter 5 Information to be provided on the arrival and departure profile of HGV and LGV deliveries. - comment	As noted above, the Applicant does not have arrival/departure profiles for HGV and LGV. However, the change in passenger numbers has been used to grow the number of HGVs and LGVs as this relates to the number of flights, which require deliveries of fuel, food etc and the amount of products required in retail and food and beverage.	this is with any changes to the mitigation proposed for the M1 Junction 10. Will the Table 9.8 be updated to reflect the latest arrivals and departures for phase 2a? Similarly other aspects of the TA will require updating to reflect any updates to the mitigation proposed.
National Highways RR-1076	Traffic and transportation	Transport assessment - chapter 5- Clarification is sought on the staff mode share numbers - comment	The Applicant requires some further clarification. It is considered that this refers to Chapter 6, but it is not clear what clarification is being sought. The basis of the future year mode share is set out in section 9.5 of the Transport Assessment [APP-204] and Table 9.4 of the same submission shows the public transport mode share assumptions.	Noted.
National Highways RR-1076	Traffic and transportation	Transport assessment - chapter 7 Details of the three accidents at the junction on the northbound on-slip M1 Junction 10 -comment	Noted, the Applicant will discuss this with National Highways in due course.	Can the details/patterns of the collisions be confirmed with National Highways? It is noted in another response to a comment that National Highways made on the collisions that this data is not available. Both the DfT and the Local Authority can provide full accident data details. This should be analysed for the cluster of collisions at the M1 Junction 10 to determine whether there is a pattern to these collisions.

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National Highways RR-1076	Traffic and transportation	Transport assessment - chapter 8 The operating performance of the Phase 2b changes in 2043 cannot be based on assumed ALR being in place. – substantive issue	The Applicant undertook scenario testing in Chapter 14 of the Transport Assessment [APP-206] . This considered the impacts of the Proposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded in the sensitivity test the mitigation strategy continues to mitigate the impacts of the scheme.	<p>It is noted that the Applicant is re basing the strategic model and VISSIM model to exclude ALR. This approach is welcomed by National Highways.</p> <p>Further clarification is sought on the revised mitigation proposed for the M1 J10 particularly the slip roads as the mitigation proposed assumed that in Phase 2b ALR would be in place prior to 2043. National Highways will continue to engage with the Applicant to agree the strategic and VISSIM modelling.</p>
National Highways RR-1076	Traffic and transportation	<p>Transport assessment - chapter 8 The Phase 2b drawings (0029 and 0030) are included within the section 'Future Baseline', as opposed to 'With Airport Development'. It is unclear why this is, as it is assumed the Phase 2b changes in their entirety are a result of, and necessary to accommodate, the airport expansion.</p> <p>Appendix A implies these works will be a 'reference case' change by 2043 irrespective of the airport expansion - comment</p>	<p>The Applicant discussed and agreed this approach with National Highways (NH) as part of the engagement. The approach assumed that improvements to the network would be required in the future baseline by 2043 and that NH was unlikely to address the mainline without consideration for the junction.</p> <p>It is noted that the NH position with regard to future baseline capacity has changed particularly given the pause on Smart Motorways.</p>	<p>In relation to the proposed mitigation for the M1 Junction 10. The following paragraph of the Department for Transport Circular 01/2022 should be noted;</p> <p><i>'29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure</i></p>

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				<p><i>will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy. And</i></p> <p><i>52. The scope and phasing of necessary transport improvements will normally be defined by the company in planning conditions that seek to manage development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a funding agreement between the development promoter and the company.'</i></p> <p>This is particularly pertinent in relation to National Highways position on the additional mitigation that is required to the M1 Junction 10 slip roads.</p>
National Highways RR-1076	Traffic and transportation	Transport assessment - chapter 8 How can diverge flows well over the capacity of a single	Noted.	This is an ongoing issue that has yet to be resolved.

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		<p>running lane and diverge point be accommodated safely due to potential drivers changing lanes – substantive issue</p>	<p>This is a baseline issue, and the Applicant will continue to work with National Highways to agree a way forward. Notwithstanding this, the proposed mitigation strategy for the junction as a whole provides substantial benefits and the assessment of the scheme should be considered in its overall contribution to improving the operation of the network.</p>	<p>National Highways' position is that there is no scheme in this location in its current plans (as has been assumed by current modelling prepared by the Applicant), nor funding allocated. It is not possible to say based on current modelling whether the mitigation proposed will provide substantial benefits. National Highways' view is a scheme to mitigate the impact on the slip roads is feasible and will need to be in place before the development can proceed. This is in addition to any mitigation that may be required by National Highways when the ALR scheme is removed from the baseline.</p>
National Highways RR-1076	Traffic and transportation	<p>Transport assessment - chapter 8 Flows exiting to the A1081 New Airport Way do not differentiate between movements continuing along the A 1081 through the London Road interchange and those exiting via London Road to London Road Roundabout – observation</p>	<p>The Applicant discussed lane choice and utilisation at M1 J10 during recent engagement with NH, where sensitivity tests were undertaken to define volumes of eastbound traffic travelling to London Road or continuing along the A1081. The tests differentiated these movements as part of an updated O/D matrix and demonstrated that queuing on the northbound off-slip would not block back onto the M1 mainline. NH were satisfied with the modelling outcomes. A comprehensive signage strategy would be required in the vicinity of M1 J10 to accommodate the proposed changes to the highway layout. These changes to signage</p>	<p>The signage strategy would need to also include the use of two gantries. The location of these gantries need to be confirmed by the Applicant prior to commencement of development and it is recommended that the Applicant confirms this prior to close of Examination so that you can be confident the gantries can be located within the order limits. This needs to be confirmed in the DCO and National Highways will attempt to provide some proposed drafting to this effect, noting that the precise framing of a Grampian</p>

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			would be picked up as part of any ongoing detailed design, with the Applicant willing to continue working alongside NH in developing an acceptable solution.	requirement may not be possible without more information from the Applicant.
National Highways RR-1076	Traffic and transportation	A signing strategy, which includes gantries above the northbound exit slip and approaching or above the southern M1 overbridge on the circulatory, to direct drivers to avoid a need for weaving and lane changing after exiting M1 Junction 10, should be conditioned in the DCO. - substantive issue	<p>Noted. A comprehensive signage strategy would be required in the vicinity of M1 J10 to accommodate the proposed changes to the highway layout.</p> <p>These changes to signage would be picked up as part of any ongoing detailed design, with the Applicant willing to continue working alongside NH in developing an acceptable solution.</p>	The signage strategy would need to also include the use of two gantries. The location of these gantries need to be confirmed by the Applicant prior to commencement of development and it is recommended that the Applicant confirms this prior to close of Examination so that you can be confident the gantries can be located within the order limits. This needs to be confirmed in the DCO and National Highways will attempt to provide some proposed drafting to this effect, noting that the precise framing of a Grampian requirement may not be possible without more information from the Applicant.
National Highways RR-1076	Traffic and transportation	Transport assessment - chapter 8 On the Phase 2b works to the A1081. (Drawing 0029) the centre lane on the A1081 approach may currently be used by drivers routing to the MI (S) or the MI (N). However, with the proposed layout this centre lane becomes a left turn only to the MI (S). Based on the predicted right turn flows to the MI (N) in this scenario, these are shown to be 1,259 vph (AM) and	As per recent discussions with Nation Highways (NH), it was agreed that minor changes such as these could be accommodated within the design as the project progresses to detail design, The Applicant intends to continue working with NH to develop the detailed design options.	Noted. This can be confirmed at the detailed design stage.

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		<p>2,379vph (PM).</p> <p>As such, confining all the MI (N) bound traffic to the outer lane would not be desirable given the PM demand, so it is considered that the centre lane would need to retain the option of 'split' destinations. Comment</p>		
National Highways RR-1077	Traffic and transportation	Transport assessment - chapter 8 The AM VISSIM results without ALR implemented show that both slip-road junctions in 2043 are 'critical', with all slip-road lanes operating over practical capacity and close to saturation, as well as those on the circulating section on the northern bridge. Substantive issue	This is a baseline issue, and the Applicant will continue to work with NH to agree a way forward. Notwithstanding this, the proposed mitigation strategy for the junction as a whole provides substantial benefits and the assessment of the scheme should be considered in its overall contribution to improving the operation of the network.	The model results demonstrate that the SRN will operate over capacity at 2043 when ALR is excluded. The applicant has not demonstrated that the impact of development traffic has been fully mitigated on the SRN.
National Highways RR-1077	Traffic and transportation	Transport assessment - chapter 8 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. Comment	<p>As outlined in Chapter 8 of the Transport Assessment [APP-206]. The Applicant used CAA mode share for car park users and the corresponding annual number of passengers to establish the annual baseline number of car park users.</p> <p>The future number of car park users was based on the future mode share assumptions and corresponding annual number of passengers.</p> <p>The growth between the future and baseline annual car park users was applied to the</p>	Has the expansion of offsite car parking been considered as part of the assessment for Luton Airport expansion? It was noted during the open floor hearings at the DCO examination that there is a car park supplier who was in discussion for some time with the applicant/Luton Borough Council regarding additional offsite car parking. If further offsite car parking is brought forward then this has the potential to have an impact on the SRN – M1 Junctions 9 to 11. Is this being factored

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			existing number of car parking spaces to derive future car parking requirements.	into the Applicant's updated traffic modelling?
National Highways RR-1077	Traffic and transportation	<p>Transport assessment - chapter 8</p> <p>Comprehensive details of the monitoring methodology are required as well as the trigger points for the implementation of the proposed upgrade phases at the M1 Junction 10- Substantive issue</p>	<p>Noted.</p> <p>The ongoing development of TRIMMA will set out additional detail on the proposed monitoring regime.</p>	<p>Noted. The TRIMMA should include a significant amount of detail in order to give National Highways comfort that the impacts of the Luton Airport expansion on the SRN will be monitored to determine that the SRN is still operating safely and efficiently.</p> <p>At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation;</p> <ul style="list-style-type: none"> • Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue for several years post full occupation to confirm that the impacts do not change over time • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National Highways time to attend meetings. Given the comprehensive nature of the

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				<p>monitoring this is labour intensive and National Highways does not have the resources to fund monitoring for developers schemes</p> <ul style="list-style-type: none"> • Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends • Details of how the Applicant will distinguish between airport and non-airport related traffic is required. • Details of how junction capacity will be monitored is required, ie how will the Applicant confirm that the mitigation that they have put in place for the SRN is effective • Details of how the triggers/thresholds for mitigation should be confirmed • Surveying for only one week for a development of this size is nowhere near sufficient. There can be significant fluctuations week

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				<p>by week, several weeks should be undertaken as a minimum to ensure that the surveys represent a neutral, average time period</p> <ul style="list-style-type: none"> It is unclear how the voting process will work for mitigation. Will the LA's be voting for whether mitigation is required on the SRN and National Highways voting for mitigation on the LRN? This is illogical as each consultee has their own concerns
National Highways RR-1077	Transport assessment	<p>Transport assessment - chapter 8</p> <p>Could it be confirmed which year of CAA data has been used to derive the baseline? Comment</p>	The Applicant used 2016 CAA data for the CBLTM-LTN base model and 2017 CAA data for the Vissim base model.	Noted.
National Highways RR-1077	Transport assessment	<p>Transport assessment - chapter 8 The requirement to be able to park maintenance vehicles safely will remain following removal of the hatched area of the northbound overbridge on the circulatory, and the facility will need to be re-provided as part of the mitigation design. The ideal location for a new parking bay (layby) would be on the eastern side of the gyratory, close to the A1081 exit. Substantive issue</p>	<p>Noted.</p> <p>It would be possible to accommodate a maintenance parking layby on the eastern side of the gyratory.</p>	<p>Details of the locations of the maintenance parking bay should be included in the DCO and drafting must be agreed between the parties to this effect. This is required to confirm whether it can be safely accommodated within the red line boundary and without affecting the junction design.</p>

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National Highways RR-1077	Transport assessment	Transport assessment - chapter 9 Details of the transport schemes' modifications are required. Comment	<p>The Applicant provides details of the proposed highway improvements within the Transport Assessment [APP-203 to APP-206].</p> <p>Table 9.2 sets out East Luton Highway Improvements (non-airport expansion related) and Table 8.1 sets out the proposed off-site highway works forming part of the Proposed Development.</p>	Noted.
National Highways RR-1076	Transport assessment	Transport assessment - chapter 9 Details of the basis of the latest aviation forecasts and the actual schedule produced and/or the number of movements anticipated on the day that the forecasts are based should be provided. Comment	<p>The Applicant gives a full explanation of the basis of the aviation forecasts in the Need Case [APP-213].</p> <p>It is noted that National Highways (NH) has indicated that these are "sound and sufficiently robust" in its review of the Transport Assessment Appendix I [APP-202] relating to the Need Case.</p>	Noted and agreed.
National Highways RR-1076	Transport assessment	Transport assessment - chapter 9 Confirmation on whether the flight schedule has been agreed with the airport and/or other stakeholders prior to its use in modelling for surface access. Comment	The Applicant notes that the future flight schedule is indicative and based on realistic expectations as to airline operating patterns. These profiles were discussed with the airlines in developing the aviation forecasts during 2018/19. Their basis is explained in section 6 of the Need Case [APP-213] .	Noted and agreed.

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National Highways RR-1076	Transport assessment	<p>Transport assessment - chapter 10</p> <p>It is requested that the Applicant's transport consultant present a comparison of VISSIM, CBLTM-LTN and TEMPRO forecast demands for each modelled scenario. This should include overall network demand, flows on the M1 and turning counts at Junction 10. Substantive issue</p>	<p>The Applicant has provided comparisons of traffic flows from the VISSIM and CBLTM-LTN models to NH.</p> <p>A scenario test was also undertaken which included growth from the strategic model into the VISSIM model which confirmed that the mitigation strategy continues to mitigate the impacts of the scheme. This is reported in Chapter 14 of the Transport Assessment [APP-206].</p>	<p>This comment has not been addressed. The Applicant should provide overall demands for the modelled area and flow diagrams for the SRN showing VISSIM, CBLTM-LTN and TEMPRO forecasts. The purpose of this is to establish how the Luton Rising forecasts compare to TEMPRO and the thus the level of confidence that NH can have in them.</p>
National Highways RR-1076	Transport assessment	<p>Transport assessment - chapter 10</p> <p>The Do Minimum scenarios contain 18mppa at Luton Airport, regardless of the year. This means that VISSIM models have not been presented for the committed transport network with proposed development demand.</p> <p>This obscures that ability to identify the impact of the proposed development on the existing highway network. Substantive issue</p>	<p>The Do Minimum scenarios are based on the existing level of consented development at Luton Airport, i.e. 18mppa. The Do Minimum scenarios do not include any additional highway mitigation in the future year scenarios as it assumes there is no airport expansion</p>	<p>This comment has not been addressed. It is necessary to understand the operation of the do-minimum network with development traffic in place in order to establish the requirement for mitigation. The impact of the airport growth from a previous stage needs to be understood in the do-minimum scenarios.</p>
National Highways RR-1076	Transport assessment	<p>Transport assessment - chapter 10.</p> <p>Observation of the models and subsequent communication with the Applicant's transport consultant indicate that the assignments have not been converged or stabilized for each modelled scenario. This gives rise to some erroneous assignment in the vicinity of Junction 10. Comment</p>	<p>Noted.</p> <p>The Applicant conducted a sensitivity test to achieve a higher level of convergence for the 2043 full development scenarios. The results of the test revealed that the models successfully met the 95% convergence criteria for four consecutive runs for all</p>	<p>How does the traffic assignment differ between the original and higher convergence model runs, particularly but not only in the vicinity of M1 J10?</p> <p>The key issues are:</p>

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			<p>scenarios in 2043.</p> <p>When comparing the original model to the higher convergence model runs, no significant differences were observed in terms of overall network performance, journey times, and the performance of M1 J10.</p>	<p>(i) how modelled turning movements at M1 10 differ between the original and higher convergence model runs; and (ii) turning movements at M1 J10 fluctuate over the last few iterations (95% convergence criteria would relate to the full model).</p> <p>There are therefore two questions:</p> <ol style="list-style-type: none"> 1. How do modelled turning movements at M1 10 differ between the original and higher convergence model runs? 2. How much do turning movements at M1 J10 fluctuate over the last three to five iterations of the model runs? <p>SATURN's 'Changes in Demand Flow' offers one possible but not conclusive check.</p>
National Highways RR-1076	Transport assessment	<p>Transport assessment - chapter 10. The assumption that an ALR (or similar) upgrade will be provided on the M1 means that the 2043 VISSIM models quoted in the Transport Assessment do not represent a realistic forecast scenario.</p> <p>Therefore, NH's confidence in the outputs from the 2043 VISSIM models is undermined. Comment</p>	<p>Chapter 14 of the Transport Assessment [APP-206] presents the findings of scenario tests conducted to assess the impacts of the Proposed Development on the M1 corridor in the CBLTM-LTN strategic model, assuming no capacity upgrades.</p> <p>In May 2023 following a request from National Highways, a sensitivity test was carried out using the VISSIM model to evaluate the operational effects of no future upgrades to</p>	<p>There is a presentational issue with the TA in that the core scenario within the document is unrealistic. Inclusion of a non-committed scheme like ALR in a core scenario runs counter to standard industry guidance such as DfT TAG. It will also impede understanding of the transport issues in the DCO as the TA is based on a set of highway infrastructure that will not be implemented.</p>

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			<p>Junction 10 of the M1 in the baseline scenario.</p> <p>This work and its findings were not included in the DCO report, however, have been shared with National Highways as part of the on-going engagement.</p>	
National Highways RR-1076	Transport assessment	<p>Transport assessment - chapter 14</p> <p>The VISSIM data in the PowerPoint provided to NH indicate that, without ALR, the model shows some congestion impacts during the AM period.</p> <p>The Phase 2b scheme does deliver an improvement in performance at the roundabout compared to the situation with no mitigation implemented.</p> <p>However, this benefit is limited by the fact that southbound merge is overloaded in both the Do Minimum and Do Something models. Substantive issue</p>	<p>The VISSIM sensitivity test shows consistent AM peak hour performance with increased throughput in the with Full development.</p> <p>In the PM peak hour, the "without Full Development" scenario is limited due to low demand flows and network constraints.</p> <p>However, the "with Full Development" scenario significantly increases throughput, reducing queues and maintaining acceptable delay and LoS levels.</p>	<p>National Highways has undertaken work to demonstrate that improvement to the northbound diverge and southbound merge at junction 10 is feasible.</p> <p>Notwithstanding bottlenecking of demand in the VISSIM model, the improved merges and diverges are shown to provide improved network operation prior to gridlock. It is advised that the potential improvements to the northbound merge and southbound diverge should be considered as part of the DCO to mitigate the impact of Luton Rising traffic.</p>
National Highways RR-1076	Transport assessment	<p>Transport assessment - chapter 14</p> <p>The 2043 the VISSIM models demonstrate significant amounts of congestion in each of the model scenarios. This is in part due to the impact of off-network delays on the M1 main carriageway that are simulated in the model. In each of the 2043 non-ALR VISSIM tests, the southbound merge is over capacity and</p>	<p>The VISSIM sensitivity test shows consistent AM peak hour performance with increased throughput in the with Full development.</p> <p>In the PM peak hour, the "without Full Development" scenario is limited due to low demand flows and network constraints.</p>	<p>National Highways has undertaken work to demonstrate that improvement to the northbound diverge and southbound merge at junction 10 is feasible.</p> <p>Notwithstanding bottlenecking of demand in the VISSIM model, the improved merges and diverges are shown to provide improved network operation prior</p>

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		generates congestion. In the PM periods this congestion is sufficient to lock up the entire model. Substantive issue	However, the "with Full Development" scenario significantly increases throughput, reducing queues and maintaining acceptable delay and LoS levels.	to gridlock. It is advised that the potential improvements to the northbound merge and southbound diverge should be considered as part of the DCO to mitigate the impact of Luton Rising traffic.
National Highways RR-1076	Transport assessment	Transport assessment - chapter 14 It would be useful to have a table showing flow differences between the two scenarios shown in Figure 14.1 and Figure 14.2. Observation	The Applicant notes that flow differences are shown in Table 14.21 and 14.24 of the Transport Assessment [APP-206] for the AM and PM peak respectively.	Noted
National Highways RR-1076	Transport assessment	Transport assessment - chapter 14 - For several of the tables/figures (Figure 14.1, Figure 14.2 Figure 14.3, Table 14.21, Table 14.22, Table 14.23, Table 14.24 and Table 14.28) there are no units. Are these numbers in PCU's or vehicles? There is also no indication of whether they are actual or demand flows. Could this be confirmed? comment	The Figures show PCUs/hour flow differences, and the Tables are in vehicles per hour. All reported flows are 'actual'.	Noted. Is there a reason why the figures show PCUs/ hr and the tables show veh/hr, as this will cause inconsistency between the two?
National Highways RR-1076	Transport assessment	Transport assessment - Chapter 14 NH needs to understand the impact of removing ALR on Junction 9 as the text indicates that traffic would reduce on the mainline carriageway and divert to the local road network. Therefore, it is likely that traffic will leave the M1 at Junction 9. At present, NH have only seen Saturn forecasts for Junction 9 with ALR. The impact on Junctions 9, 11 and 11a of traffic diverting to the A5 to avoid congestion	The Applicant undertook scenario testing in Chapter 14 of the Transport Assessment [APP-206] . This considered the impacts of the Proposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded in the sensitivity test the mitigation strategy	Ongoing Issue still to be agreed with National Highways in the rebased modelling that is being undertaken. Chapter 14 of the Transport Assessment does not go into detail of how traffic is dispersed after the removal of ALR. It would be useful to present the results of with and without ALR in a tabular form.

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		should also be understood. Substantive issue	continues to mitigate the impacts of the scheme.	
National Highways RR-1076	Transport assessment	Transport assessment - Chapter 14. NH would request to be part of the ATF and the FTP steering groups in order that they are able to monitor the impacts of the development. Observation	The Airport Transport Forum (ATF) is comprised of representatives from local authorities, National Highways, and public transport operators. It is intended that forum attendance is encouraged from National Highways going forward.	Could the applicant please confirm whether the ATF steering group meetings are already taking place? National Highways does not know the details of these and has not been invited to attend any meetings. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.
National Highways RR-1076	Transport assessment	Transport assessment _ Appendix B What are differences between the M2 Tag old and new versions and what are the likely impacts on the Proposed Development? Comment	M2 TAG was current at the time of preparing the Strategic Modelling: Model Specification Report in 2018. It is anticipated that there are likely to be little or no impact on the development of the variable demand model.	Response noted and accepted as it stands. However, TAG M2 addresses more than variable demand modelling. M2.1 is concerned with 'Variable Demand Modelling' and M2.2 is concerned with 'Base Year Demand Matrix Development'. It is possible that the representation assumed only the former.
National Highways RR-1076	Transport assessment	Transport assessment - Appendix I The full details of the proposed traffic monitoring methodology should be set out in the TRIMMA. There is insufficient detail provided for NH to accept the monitoring and delivery approach to highway	Noted. The ongoing development of TRIMMA will set out additional detail on the proposed monitoring regime.	The TRIMMA should include a significant amount of detail in order to give National Highways comfort that the impacts of the Luton Airport expansion on the SRN will

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		<p>capacityinterventions on the SRN. Substantive issue</p>		<p>be monitored to determine that the SRN is still operating safely and efficiently.</p> <p>At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation;</p> <ul style="list-style-type: none"> • Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue for several years post full occupation to confirm that the impacts do not change over time • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National Highways time to attend meetings. Given the comprehensive nature of the monitoring this is labour intensive and National Highways does not have the resources to fund monitoring for developers schemes • Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is

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				<p>required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends</p> <ul style="list-style-type: none"> • Details of how the Applicant will distinguish between airport and non-airport related traffic is required. • Details of how junction capacity will be monitored is required, ie how will the Applicant confirm that the mitigation that they have put in place for the SRN is effective • Details of how the triggers/thresholds for mitigation should be confirmed • Surveying for only one week for a development of this size is nowhere near sufficient. There can be significant fluctuations week by week, several weeks should be undertaken as a minimum to ensure that the surveys represent a neutral, average time period • It is unclear how the voting process will work for mitigation. Will the LA's be voting for whether mitigation is required on the SRN and National Highways voting for mitigation on the LRN?

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				This is illogical as each consultee has their own concerns
National Highways RR-1076	Traffic and transportation	<p>Framework travel plan - The FTP approach will need to be secured through a planning condition.</p> <p>NH will also need to agree to the approval of each TP produced, which should be produced in line with prevailing policy and best practice - substantive issue</p>	<p>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 Development Consent Order [AS-005], as specified by Requirement 30.</p> <p>The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to the vision and objectives of the Surface Access Strategy and realising Sustainable Transport Opportunities.</p> <p>Further details will be shared during the course of the examination, following further consultation with relevant stakeholders on the details of the Sustainable Transport Fund.</p> <p>It is the role of the relevant planning authority (Luton Borough Council) to discharge applications under Requirement 30 and approve periodic TPs produced by the airport operator. LBC will ensure that feedback from the relevant highway authorities and National</p>	<p>Noted and to clarify Requirement 30 (1) states: "...no part of the authorised development is to be operated until a travel plan for the operation of that part of the authorised development has been submitted to and approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function."</p> <p>Requirement 30 (3) states: "Every five years following the date a travel plan was submitted for approval under subparagraph (1), the undertaker must submit an updated travel plan to the relevant planning authority for approval in writing, following consultation with the relevant highway authority on matters related to its function"</p> <p>National Highways believes 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</p>

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			Highways, through the ATF has been accounted for in the production of each Travel Plan (TP).	Highways seeks to discuss with the Applicant and the Local Authorities to confirm the frequency for the review of the targets. Could the applicant please confirm whether the ATF steering group meetings are already taking place? National Highways does not know the details of these and has not been invited to attend any meetings. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.
National Highways RR-1076	Traffic and transportation	Framework travel plan - chapter 2 Reference should also be made to the DfT Circular 01/2022. Observation	Noted.	Closed
National Highways RR-1076	Traffic and transportation	Framework travel plan - chapters 2 and 7 Luton has an active ATF and as indicated later in the FTP, NH should be invited to join this ATF as a statutory consultee. Observation	The Airport Transport Forum (ATF) is comprised of representatives from local authorities, National Highways, and public transport operators. It is intended that forum attendance is encouraged from National Highways going forward.	Could the applicant please confirm whether the ATF steering group meetings are already taking place? National Highways does not know the details of these and has not been invited to attend any meetings. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.

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National Highways RR-1076	Traffic and transportation	Framework travel plan - chapter 3 Acknowledging the TP is a framework; it does not provide any real detail of the existing surface access situation. The FTP is effectively a standalone document to inform future phased TPs and at this stage it should demonstrate what the base situation is. Observation	Noted. The Transport Assessment [APP-203 to APP-206] provides a detailed description of the existing surface access context.	This detail should be carried forward into the Framework Travel Plan (as a standalone document) and updated in future iterations to inform the baseline.
National Highways RR-1076	Traffic and transportation	Framework travel plan - chapter 4 NH should be consulted on the CAA data and the related targets to prior to approval to confirm an acceptable approach has been applied. Observation	As stated within the Framework Travel Plan [APP-229] submitted by the Applicant, the future TP will be produced every 5 years using the last 5 years of CAA data from the annual monitoring surveys. As part of the Travel Plan monitoring consultation will be undertaken to determine whether any mitigation is required and the appropriate mitigation to improve sustainable travel. This could be via the Airport Transport Forum or similar.	National Highways will need to be consulted on the CAA data used and agreement of targets, as well as mitigation, for each iteration of the Travel Plan. Could the applicant please confirm whether the ATF steering group meetings are already taking place? National Highways does not know the details of these and has not been invited to attend any meetings.
National Highways RR-1076	Traffic and transportation	Framework travel plan - chapters 4,6 and 7 NH will require additional information on how the % targets translate into actual reductions in airport generated vehicle numbers (including freight), on and around the SRN, how these will be monitored and how they relate to any proposed highway interventions to be set out in the TRIMMA. Comment	The Transport-Related Monitoring and Mitigation Approach (TRIMMA), developed from the Outline TRIMMA (refer to the Transport Assessment Appendices – Part 3 of 3 (Appendices G – M) [APP-202] will include detail on the required monitoring and reporting related to traffic flows and congestion, focused on the localised impacts and required mitigation identified by the Transport Assessment.	The TRIMMA will need to demonstrate how agreed Travel Plan % targets, for each iteration, translate into actual reductions in airport generated vehicle numbers (including freight) as well as providing details on monitoring and mitigation. At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation;

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			<p>The Travel Plans produced every 5 years will include further detail on interventions and measures to encourage sustainable travel by passengers and staff.</p>	<ul style="list-style-type: none"> • Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue for several years post full occupation to confirm that the impacts do not change over time • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National Highways time to attend meetings. Given the comprehensive nature of the monitoring this is labour intensive and National Highways does not have the resources to fund monitoring for developers schemes • Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends

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				<ul style="list-style-type: none"> • Details of how the Applicant will distinguish between airport and non-airport related traffic is required. • Details of how junction capacity will be monitored is required, ie how will the Applicant confirm that the mitigation that they have put in place for the SRN is effective • Details of how the triggers/thresholds for mitigation should be confirmed • Surveying for only one week for a development of this size is nowhere near sufficient. There can be significant fluctuations week by week, several weeks should be undertaken as a minimum to ensure that the surveys represent a neutral, average time period • It is unclear how the voting process will work for mitigation. Will the LA's be voting for whether mitigation is required on the SRN and National Highways voting for mitigation on the LRN? This is illogical as each consultee has their own concerns

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National Highways RR-1076	Traffic and transportation	Framework travel plan - chapter 4 NH will need to be consulted on any review of targets within each TP prior to approval and to understand the reason for any change, ensure they remain suitably ambitious and that agreed commitments or measures have been reasonably delivered in accordance with each phased TP. Observation	The Applicant set out the Travel Plan targets within the Framework Travel Plan [AS-131] . These are more ambitious than the Green Controlled Growth (GCG) limits and will be monitored every 5 years.	National Highways will need to be consulted on any review of targets within each iteration of the Travel Plan prior to approval
National Highways RR-1076	Traffic and transportation	Framework travel plan chapters 4, 6,7 Any reports monitoring progress against targets should be submitted to NH for review prior to approval. Observation	It is the role of the relevant planning authority (Luton Borough Council) to discharge applications under Requirement 30 and approve periodic Travel Plans (TP) produced by the airport operator. LBC will ensure that feedback from the relevant highway authorities and National Highways, through the ATF has been accounted for in the production of each TP.	Noted and to clarify Requirement 30 (1) states: "...no part of the authorised development is to be operated until a travel plan for the operation of that part of the authorised development has been submitted to and approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function." Requirement 30 (3) states: "Every five years following the date a travel plan was submitted for approval under subparagraph (1), the undertaker must submit an updated travel plan to the relevant planning authority for approval in writing, following consultation with the relevant highway authority on matters related to its function"

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				<p>National Highways believes 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.</p> <p>Could the details of the ATF steering group meetings be provided? National Highways has not been invited to attend any of these meetings to date.</p>
National Highways RR-1076	Traffic and transportation	<p>Framework travel plan - chapter 5</p> <p>The long list of measures and proposed toolkit approach for future phased TPs to draw upon is noted. Prior to approval, each phased TP submitted should provide a more detailed assessment of the proposed measures to be implemented and the level of sustainable mode shift they are expected to deliver. Observation</p>	<p>Noted.</p> <p>Future phased Travel Plans will provide more detail on the measures and interventions selected to be implemented for that particular TP, in line with the Targets proposed.</p>	<p>Noted and this should include details on the level of sustainable mode shift each measure is expected to deliver.</p>
National Highways RR-1076	Traffic and transportation	<p>Framework travel plan - chapters 6 and 7 NH should be consulted on the proposed staff survey, monitoring and data collection methodology prior to the approval of each subsequent phased TP to ensure a consistent approach is adopted. Observation</p>	<p>The Applicant is committed to working with local stakeholders through the Travel Plan process. The Applicant has produced a Framework Travel Plan [AS-131] that outlines the process of engagement for future Travel Plan (produced every 5-years). This includes consultation through the Airport</p>	<p>Requirement 30 (3) states: "Every five years following the date a travel plan was submitted for approval under sub paragraph (1), the undertaker must submit an updated travel plan to the relevant planning authority for approval in writing, following consultation with the</p>

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			<p>Transport Forums, which provides a mechanism to engage with National Highway on monitoring and data collection as well as future mitigation proposals</p>	<p>relevant highway authority on matters related to its function”</p> <p>National Highways believes 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. Could the details of the ATF steering group meetings be provided? National Highways has not been invited to attend any of these meetings to date. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.</p>
National Highways RR-1076	Traffic and transportation	<p>Environmental Statement - chapter 4 Confirmation of the highways boundary and land take is required for the improvements to M1 J 10, particularly to the west of the junction. 'Off-Site Highway Interventions' state that all works occur within highway estate boundaries, however specific work order descriptions do not explicitly confirm this. Comment</p>	<p>The proposed works to M1 J10 have been designed to fall within the existing highway boundary, with the exception of the construction compound to the immediate south-west of the junction.</p>	<p>Noted and accepted.</p>

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National Highways RR-1076	Environmental Statement - compounds	Environmental Statement - chapter 4 Management and operation of the construction compound, such as any Section 61 applications, expected Traffic Management arrangements, and site lighting (in the absence of other street lightsources on Half Moon Lane) should be detailed. Comment	The Code of Construction Practice referred to in Chapter 4 [APP-031] and provided as Appendix 4.2 to the Environmental Statement (ES) [APP- 049] describes the proposed measures to manage environmental effects of construction including section 61 application, traffic management and lighting.	Noted and accepted.
National Highways RR-1076	Environmental Statement - compounds	Environmental Statement - chapter 6 The precise footprint of the construction compound(s) is not clear, nor the nature of any permanent land-take. Comment	Chapter 6 Agricultural Land Quality and Farm Holdings [APP-146] of the Environmental Statement (ES) contains sufficient information to undertake the assessment. There is no permanent landtake for the construction compound at J10 of the M1. Further detail on land to be acquired temporally and/or permanently is shown in the Land Plans and Crown Land Plans [AS-011 and AS-024] .	Noted and accepted.
National Highways RR-1076	Environmental Statement - compounds	Environmental Statement - chapter 8 The Applicant should cross-check the proposals against the strategic objectives of any updated NH Plan as the asset landowner, or through direct consultation. Comment	Noted. As final proposals develop, they can be reviewed against the latest NH Plan and NH can be consulted.	Noted and accepted.
National Highways RR-1076	Traffic and transportation	Environmental Statement - chapter 9 NH requires that the final M1 Junction 10 design is, or can be compliant with, appropriate drainage standards and climate change scenarios. Observation	The final M1 Junction 10 design will be designed to be compliant with appropriate drainage standards and climate change scenarios.	Noted and accepted.

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National Highways RR-1076	PROW	<p>Environmental Statement chapter 14 The nearby public right of way FP12 is shown on figures as being close to the M1 Junction 10 works but does not appear to be specifically assessed in the chapter.</p> <p>Comment</p>	<p>FP12 is to the southeast of J10 of the M1. Users are not expected to experience impacts due to the Proposed Development therefore were not included within the assessment.</p> <p>The receptors considered within the landscape and visual assessment were agreed with Central Bedfordshire Council (CBC) and the wider LVIA Working Group and are described in section 14.4 of Chapter 14 Landscape and Visual [AS-079] of the Environmental Statement (ES).</p>	Noted, including that BW1 is assessed, and accepted.
National Highways RR-1076	LVIA	<p>Environmental Statement - chapter 14 As a result of consultations in 2022 with CBCe and the Applicant, two additional visual receptors affected by the M1 J10 works were agreed for inclusion within ES scope. There is no apparent reference to the additional receptors requested by the Council incorporated within the visual assessment chapter. Comment</p>	<p>The additional receptors included as a result of discussions with CBC regarding the works at J10 of the M1 were users of Bridleway 1 and users of Half Moon Lane, near J10 of the M1. Both are included in Chapter 14 Landscape and Visual [AS-079] of the Environmental Statement (ES) and Appendix 14.5 Detailed Visual Assessment [AS-087] of the ES in the same way as any other visual receptors, no specific reference is required.</p>	Noted and accepted.
National Highways RR-1076	Noise	<p>Environmental Statement - chapter 16 It is assumed that noise assessment examined only the effects of the construction of the highway improvements and did not include the effects of the construction compound. Confirmation of this is sought.</p>	<p>The methodology for the construction noise assessment is based on current industry standard approach and is presented in Section 16.5 of Chapter 16 of the Environmental Statement (ES) [AS-080] and details of the works that are included in the</p>	Noted and accepted.

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		Comment	assessment are presented in Section 5 of Appendix 16.1 Noise and Vibration Information [AS- 096] of the Environmental Statement (ES). As set out in this appendix, the assessment is based on reasonable worst-case activities that are likely to generate the highest noise levels during construction. In line with this methodology, the construction compound has not been assessed due to the relatively minor works required, limited duration of noisy works and distance to the nearest sensitive receptors. Measures included within the Code of Construction Practice [APP-049] will be sufficient to manage noise and vibration emissions from the construction compound.	
National Highways RR-1076	OCTMP	Outline Construction Traffic Management Plan (CTMP) - Appendix 18.3 A full CTMP will need to be secured through a planning condition stating that prior to the commencement of the development, a CTMP and a phasing plan shall be agreed and approved in writing with the LPA/ highways authorities / NH. Substantive Issue	The Draft Development Consent Order [AS-005] requires that development of any part of the Proposed Development may not commence until the Construction Traffic Management Plan (CTMP) for that part has been approved by the relevant planning authority, following consultation with the relevant highway authority.	Noted and accepted.
National Highways RR-1076	OCTMP	Outline Construction Traffic Management Plan (CTMP) - Appendix 18.3 It would be useful to have more information and mapping of any identified sensitive routes, areas or populations that could be restricted to construction traffic and have potentially divert traffic onto the SRN.	By seeking to limit construction traffic to the SRN, sensitive areas will be avoided as far as reasonably practicable. The Applicant is aware of the air quality issues along the A602 in Hitchin, hence construction traffic which does not have a	Information and proposed mitigation to reduce the impact on sensitive areas will be set out in the CTMP secured through Requirement 14 of the Draft Development Consent Order.

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		Further information is required on complex areas where traffic management could be needed on the SRN and adjoining local road network e.g., junctions, structures. Comment	local origin will be discouraged from using this route. As referred to in an earlier response, complex temporary traffic management measures will be agreed with relevant highway authorities following the appointment of the leading contractor and during the design process.	With reference to agreement of "complex temporary traffic management measures", can the Applicant confirm that, where needed, appropriate modelling will be provided to demonstrate the impact of any temporary measures on the SRN and that unacceptable impacts on congestion and safety can be mitigated prior to the agreement of the CTMP secured through Requirement 14 of the Draft Development Consent Order.
National Highways RR-1076	OCTMP	Outline Construction Traffic Management Plan (CTMP) - Appendix 18.3 It will be the responsibility of the Applicant and lead contractor to monitor the execution of the approved CTMP and report back to NH and others via the TMWG to advise on mitigation, updates to program and any proposed changes to the CTMP for approval. Observation	The lead contractor will appoint a senior member of staff who will be the designated liaison officer responsible for the implementation, day-to-day management, and monitoring of the approved CTMP, but the overall monitoring will lie with the TMWG which will include amongst its members, the Applicant and representatives from the relevant highway authorities that accept the invitation to join.	To clarify, National Highways will provide comments, advice and recommendations for further actions based on the monitoring data provided by the Applicant and/or lead contractor to the TMWG. Responsibility for the costs, collection, analysis and reporting of monitoring to the TMWG will lie with the Applicant and/or lead contractor.
National Highways RR-1076	OCTMP	Outline Construction Traffic Management Plan (CTMP) - Appendix 18.3 Paragraph 4.1.3 states 300 movements at peak but 'Construction Impacts on Strategic Road Network - Technical Note' (Arup, March 2023) talks of over 460 two-way movements during peak construction please clarify which is correct. Comment	The figure of over 460 two-way movements during peak construction matches the figure for the daily number of construction vehicles shown in paragraph 18.9.45 of Chapter 18 Traffic and Transportation [AS-030] of the Environmental Statement (ES) when it is factored by two to reflect total movements on the highway network.	Noted.

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			<p>The values in the Technical Note and the Environmental Statement should be taken as a more accurate indication of peak traffic levels.</p> <p>The figure in the Outline Construction Traffic Management Plan [APP-130] would be superseded when the Construction Traffic Management Plan (CTMP) is produced, and the lead contractor's work programme is known.</p>	
National Highways RR-1076	OCTMP	Outline Construction Traffic Management Plan (CMTP) - Appendix 18.3 Section 4.2 Routeing of Construction Traffic - more details of routing on the SRN and local adjacent network, construction traffic volumes and times of delivery will need to be agreed through the eventual approved CTMP prior to commencement. Observation	Noted.	Accepted.
National Highways RR-1076	OCTMP	Outline Construction Traffic Management Plan (CMTP) - Appendix 18.3 More specific details of temporary traffic management on the SRN and local adjacent network will need to be agreed in the approved CTMP. Observation	<p>The Applicant believes it would be premature to get into this level of detail before a lead contractor was appointed.</p> <p>The more specific details of temporary traffic management on the SRN and local adjacent network would be agreed as part of the detailed CTMP when the lead contractor's methodology has been determined.</p>	Can the Applicant confirm that, where needed, appropriate modelling will be provided to demonstrate the impact of any temporary measures on the SRN and that unacceptable impacts on congestion and safety can be mitigated prior to agreement of the CTMP secured through Requirement 14 of the Draft Development Consent Order.
National Highways RR-1076	OCTMP	Outline Construction Traffic Management Plan (CMTP) - Appendix 18.3 An approved	Noted.	Noted and accepted.

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		<p>monitoring plan of volumes, type, delivery times and numbers of arrivals outside of allocated slots.</p> <p>Monitoring plan to be agreed in the approved CTMP and all information will need to be made available to National Highways via the TMWG. Observation</p>	<p>Appendix 18.3 Outline Construction Traffic Management Plan [APP-130] includes a proposal for a Traffic Management Working Group to be formed as a forum for stakeholder engagement during construction (refer to Section 3 of the Outline Construction Traffic Management Plan [APP-130]). A detailed CTMP, substantially in accordance with the Outline CTMP, will be prepared and submitted for approval by the relevant local planning authority following approval of the DCO. This is secured by Requirement 14 of the Draft Development Consent Order [AS-005].</p>	
National Highways RR-1076	OCTMP	<p>Outline Construction Traffic Management Plan (CMTP) Appendix 18.3</p> <p>More details for proposed abnormal loads, communication /engagement plans, and proposed mitigation will need to be agreed in the approved CTMP. This will need to be monitored and all information to be shared with NH via the TMWG. Observation</p>	Noted.	Accepted.
National Highways RR-1076	OCTMP	<p>Outline Construction Traffic Management Plan (CMTP) - Appendix 18.3</p> <p>Analysis of existing safety and collision data on key construction routes should be provided in the outline CTMP and then updated in the approved CTMP. Comment</p>	<p>The Applicant has reported existing safety and collision data in the Transport Assessment [APP-203 to APP-206] and it is not considered that it is necessary to include this in the CTMP.</p>	<p>Updated safety and collision data should be reviewed and included in the agreed CTMP secured through Requirement 14 of the Draft Development Consent Order. Any unacceptable temporary impacts on safety from construction traffic would need appropriate mitigation.</p>

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National Highways RR-1076	OCTMP	<p>Outline Construction Traffic Management Plan (CTMP) - Appendix 18.3</p> <p>Initial information should be provided now of proposed data to be collected, the area of interest and specific locations within it. A detailed monitoring plan will then need to be agreed in the approved CTMP prior to commencement. This will need to include, but not limited to:</p> <ul style="list-style-type: none"> • Agreed monitoring area of interest • Pre-construction data collection • Volumes, type and speed of traffic • Safety • Reducing carbon emissions • Wider impacts of traffic management • All data to be analysed and reported to National Highways via TMWG 	<p>Although preferred construction routes have been proposed in the Outline Construction Traffic Management Plan[APP-130], these are subject to agreement with the relevant highway authorities.</p> <p>Until they have been agreed the monitoring area of interest cannot be defined.</p> <p>The Traffic Management Working Group, which National Highways will be invited to join, will have the opportunity identify the issues that should be included in the monitoring process.</p>	Noted and accepted.
National Highways RR-1076	OCWTP	<p>Outline Construction Workers Travel Plan(CWTP) - Appendix 18.4 A full CWTP will need to be secured through a planning condition stating that prior to the commencement of the development, a CTMP and phasing plan shall be agreed and approved in writing with the LPA / highways authorities / NH. Substantive issue</p>	<p>The Applicant has produced and submitted an Outline Construction Workers Travel Plan [APP-131] as part of the Environmental Statement to identify key matters that will need to be considered by the lead contractor during the logistical planning and execution of the construction works. As stated in the OCWTP, a CWTP for each part of the Proposed Development will be prepared by the lead contractor, substantially in accordance with this Outline CWTP, and will be submitted for approval from the relevant planning authority (in consultation with the relevant highway authority) prior to the commencement of the Proposed Development, as required by the</p>	Noted and to clarify this requirement is secured under Requirement 15 of the Draft Development Consent Order.

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			Development Consent Order. The CWTP would be agreed with the relevant highway authorities (prior to construction commencement) once a contractor has been appointed and the construction methodology/programme is defined in detail.	
National Highways RR-1076	Protective provision	Protective Provisions. Agreement to a set Protective Provisions is essential to enable National Highways to discharge its duties under the Infrastructure Act (2015) on behalf of the Secretary of State for Transport. It is requested that these are incorporated into the finalised DCO to afford National Highways with sufficient protection in respect of the safe operation of the SRN and its commercial position. Substantive Issue	The Applicant is in ongoing discussion with National Highways to address matters raised in its Relevant Representation. Draft protective provisions have been received and are under review.	A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.
National Highways RR-1076	Protective provision	Book of Reference Land ownership and temporary/permanent acquisition issues to be discussed and agreed between the parties' legal advisers as part of the Protective Provisions. Substantive Issue	Draft protective provisions have been received and are under review.	A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.
National Highways RR-1076	Protective provision	N/A Commuted Lump Sum for maintenance of the M1 Junction 10 mitigation works to be calculated and agreed as part of the Protective Provisions. Substantive Issue	Draft protective provisions have been received and are under review.	A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.

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National Highways RR-1076	Transport assessment	<p>Transport Assessment - 1. Introduction Paragraph 1.1.4 sets out the key elements of the Proposed Development including 'further infrastructure enhancements and initiatives to support the target of achieving zero emission ground operations by 2040.' Paragraph 11 of the DfT Circular 01/2022 reiterates National Highways (NH's) support of achieving Net Zero; 'Alongside this, the company has an important role to play in the drive towards zero emission transport through its commitment to net zero maintenance and construction emissions by 2040 and net zero road user emissions by 2050, and its role as a statutory consultee in the planning system.' NH notes that there are assessment phases (set out in Paragraph 1.1.16), notwithstanding that the development will be brought forward in increments which may differ from the assessment phases.</p> <p>Although the Applicant references a monitoring approach in the application, it lacks detail on how it would operate and be managed. NH seeks to understand how the development will be monitored with reference to the trip generation and phasing of the junction improvements to M1 Junction 10, which are critical to its safe and efficient operation.</p> <p>NH is keen to understand how monitoring will differentiate the background growth and traffic associated with the Proposed Development. NH believes that the detailed approach and specific</p>	This monitoring approach is under consideration and will be reported on in due course.	<p>The TRIMMA should include a significant amount of detail in order to give National Highways comfort that the impacts of the Luton Airport expansion on the SRN will be monitored to determine that the SRN is still operating safely and efficiently.</p> <p>At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation;</p> <ul style="list-style-type: none"> • Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue for several years post full occupation to confirm that the impacts do not change over time • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National Highways time to attend meetings. Given the comprehensive nature of the monitoring this is labour intensive and National Highways does not have the resources to fund monitoring for developer schemes

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		<p>trigger points for monitoring should form part of a condition for the DCO application as this is critical to the timing of infrastructure delivery.</p>		<ul style="list-style-type: none"> • Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends • Details of how the Applicant will distinguish between airport and non-airport related traffic is required. • Details of how junction capacity will be monitored is required, ie how will the Applicant confirm that the mitigation that they have put in place for the SRN is effective • Details of how the triggers/thresholds for mitigation should be confirmed • Surveying for only one week for a development of this size is nowhere near sufficient. There can be significant fluctuations week by week, several weeks should be undertaken as a minimum to ensure that the surveys represent a neutral, average time period

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				<ul style="list-style-type: none"> It is unclear how the voting process will work for mitigation. Will the LA's be voting for whether mitigation is required on the SRN and National Highways voting for mitigation on the LRN? This is illogical as each consultee has their own concerns
National Highways RR-1076	Transport Assessment	<p>4. Transport Planning Background It is noted that paragraph 4.11 makes reference to Road Investment Strategy 2 (RIS2) which sets out the five-year strategy for investment and management of the Strategic Road Network (SRN) up to March 2025.</p> <p>It should be noted within this report that no reference is made in RIS2 to any proposed or future pipeline schemes on the M1 at junction 10, including All Lane Running (ALR) or any other capacity enhancement.</p> <p>Furthermore, following the recent Government announcement 'Plans for new smart motorways cancelled' (17th April 2023), it should be noted that an ALR smart motorway solution to providing capacity enhancement to the south of junction 10 will no longer be an option.</p> <p>It should further be noted that it was also announced on 17th April that the existing pipeline of major schemes will be deferred to RIS 4 (2030-</p>	Noted.	No comment

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		35). Whilst reference has been made to the Department for Transport Circular 02/2013, reference should also be made to its replacement, the Department for Transport Circular 01/20223.		
National Highways RR-1076	Traffic and transportation	<p>5. Highway Network</p> <p>Paragraph 5.6.2 states that the 'the Short, Mid and Long stay car parks provided a total of 10,550 spaces for passengers, pre-Covid-19-pandemic.</p> <p>This level of car parking was required at the point when the airport reached its permitted capacity of 18 mppa.' It is noted that this level of car parking has now been reduced to 9,055. It is also noted in the car parking forecasts submitted by the Applicant (September 2021) that 9,717 car parking spaces are required for the Do Minimum scenario 18mppa. Are there any car park capacity / utilisation surveys available that provide evidence that this level of car parking is currently fully utilised?</p>	<p>Noted.</p> <p>On-site car park surveys were undertaken as part of the baseline data gathering exercise and these can be discussed with NH as part of ongoing collaboration.</p>	Can the car parking utilisation surveys be shared with National Highways?
National Highways RR-1076	Transport Assessment	<p>Tables 6.8 and 6.14 illustrate the number of staff arrivals and departures during the AM and PM peak period.</p> <p>Due to the 24-hour nature of the airport operations, it would be useful to understand the breakdown of arrival and departures of staff over the duration of a day. Table 6.8 table indicates that no staff depart during the AM peak hour. Further analysis would enable NH to understand whether the staff arrival and departure pattern</p>	The Applicant does not have a daily profile of staff arrivals and departures as the impact analysis is focussed on the highway peak hours. The airport operations involve day workers and 24-hour shift workers. Since shift workers do not impact on the highway peak hours, the TA only considers the day workers. It was assumed that 60% of day workers arrived in the morning peak hour, and 45% departed in the evening peak hour. The	Noted.

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		aligns with that of the highways network. Similarly, it would be useful to understand the arrival and departure profile of HGV and LGV deliveries as it would be anticipated that many of these deliveries are re-timed to outside of the highways network peak hours which could form part of the mitigation/delivery and servicing plan.	Applicant does not have a daily profile of arrivals and departures of HGV and LGV, as again, the impact analysis is focused on the highway peak hours.	
National Highways RR-1076	Transport Assessment	Table 6.14 sets out the staff arrivals. This shows an arrival total of 459 and departure of 344. The staff mode share is then set out in Table 6.15. This gives a total of 465 arrivals and 348 departures. It is unclear why the numbers vary. Furthermore, it is indicated that the staff mode shares are based on table 6.4, this gives a total of 59% 'car driver alone'. When applied to 465, this equates to 274 'car driver alone' trips where, as table 6.15 indicates, this is 271. Clarification is sought on the staffmode share numbers.	The small variation in numbers is due to rounding in the calculation. The staff mode split is based on Table 6.4 as stated in the Transport Assessment [APP-203 to APP-206] . The difference between the numbers in Tables 6.14 and 6.15 is immaterial, and the numbers in Table 6.15 which are carried through to the impact analysis are higher.	Noted.
National Highways RR-1076	Transport Assessment	7. Personal Injury Collision Data Analysis of the accident data at the M1 Junction 10 indicates that the highest number of collisions in any one location (three) in 2019 was on the northbound on- slip. It would be useful to NH to have further details of these to understand the pattern of these three accidents and whether there is an underlying safety issue at the northbound on-slip.	The Applicant does not have the causation details for the accidents, as inline with typical practice this was not required for the Transport Assessment [APP-203 to APP-206] . The Applicant confirms that the proposed schemes have been designed with consideration Design Manual for Roads and Bridges (Ref 4), Manual for Streets (Ref 5) and relevant local authority standards, however the Applicant would work with the relevant local authorities following approval of	Can the details/patterns of the collisions be confirmed with National Highways? It is typical practice for this to be included in a Transport Assessment. Both the DfT and the Local Authority can provide full accident data details. This should be analysed for the cluster of collisions at the M1 Junction 10 to determine whether there is a pattern to these collisions. It should be noted that this is a statutory requirement for GG104 and a Road Safety Audit which is set out in the following paragraph in the

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			<p>the DCO in developing the highway mitigation schemes.</p>	<p>Department for Transport Circular 01/2022;</p> <p><i>25. The DMRB sets out the details of the Secretary of State's requirements for access, design and audit in the highway scheme design process to which development proposals must conform. In this regard, GG 104 (or its subsequent update) identifies the framework and approach for safety risk assessment to be applied when undertaking any activity that may have an impact on safety on the SRN....</i></p> <p><i>...In turn, development promoters should prepare a preliminary design and Stage 1 Road Safety Audit (see GG 119) before planning permission is applied for, to demonstrate that road safety issues have been considered. Early engagement with the company is therefore encouraged to ensure that the above and further highway standards in the DMRB are appropriately addressed.'</i></p>

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National Highways RR-1076	Transport Assessment	<p>8. Development Proposals</p> <p>Chapter 8 of the Transport Assessment describes the development proposals and how these are expected to evolve during Phases 1,2a and 2b. With regard to Phase2b, it is noted the proposed changes rely on the introduction of ALR on the southbound M1 to the south of Junction 10, by removing the existing hard shoulder. The Applicant has been advised in ongoing discussions with NH since January 2022 that the operating performance of the Phase 2b changes in 2043 cannot be based on an assumption that ALR (or similar capacity enhancement) has been implemented, for the reasons explained in the response to Section four in this Annex. Within Appendix A, it is also noted that the Phase 2b drawings (0029 and 0030) are included within the section 'Future Baseline', as opposed to 'With Airport Development'. It is unclear why this is, as it is assumed the Phase 2b changes in their entirety are a result of, and necessary to accommodate, the airport expansion.</p> <p>However, this grouping in Appendix A implies these works will be a 'reference case' change by 2043 irrespective of the airport expansion. National Highways believes that this should not be assumed to be the case.</p>	<p>The Applicant undertook scenario testing in chapter 14 of the Transport Assessment – Part 4 of 4 (Chapters 11-16) [APP-206]. This considered the impacts of the Proposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded in the sensitivity test the mitigation strategy continues to mitigate the impacts of the scheme.</p>	<p>In relation to the proposed mitigation for the M1 Junction 10. The following paragraph of the Department for Transport Circular 01/2022 should be noted;</p> <p><i>'29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy. And</i></p> <p><i>52. The scope and phasing of necessary transport improvements will normally be defined by the company in planning conditions that seek to manage</i></p>

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				<p><i>development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a funding agreement between the development promoter and the company.'</i></p> <p>This is particularly pertinent in relation to National Highways position on the additional mitigation that is required to the M1 Junction 10 slip roads.</p>
National Highways RR-1076	Transport Assessment	Section 8.5 'Road Traffic Forecasts' refers to the VISSIM modelling undertaken to indicate the robustness of the mitigation measures at M1 Junction 10. As part of ongoing dialogue with Applicant's surface access consultant, additional LinSig modelling was requested for M1 Junction 10 and comments on these results are also included here in assessing the adequacy of the highway changes to the SRN presented in Chapter 8 of the Transport Assessment. In terms of this infrastructure, comments based on both	Noted.	No comment.

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		<p>examination of the Appendix A plans and this additional LinSig modelling are included in the subsequent comments.</p>		
National Highways RR-1076	Transport Assessment	<p>During the AM peak hour, the volume diverging from the M1 northbound mainline to the northbound exit slip-road to M1 Junction 10 is predicted in 2043 with airport growth to be 2,974 vehicles per hour (vph), and 2,516vph in the PM peak hour.</p> <p>However, the existing main-line northbound carriageway on approach to Junction 10 has four lanes, all of which continue through the interchange. Therefore, the diverge to the exit slip-road is limited to the nearside lane, even though two lanes emerge on the slip-road shortly after the initial exit point and run parallel for 200m before the nose to the taper is reached. It is thus unclear how diverge flows well over the capacity of a single running lane (approximately 1800vph) and diverge point are to be accommodated safely.</p> <p>Accommodating this level of exit flow will encourage and in fact necessitate driver 'swooping' across from mainline Lane 2 to Lane 1, with these drivers then required to force access into the parallel 2-lane slip-road length between the nearside lane diverge point and the 'nosing' (200m).</p>	<p>Noted.</p> <p>The 2043 core modelling assumed a 5-lane section thereby enabling two lanes to effectively exit the motorway.</p> <p>In the absence of any upgrade to the baseline network for the motorway, the identified issue would be a baseline issue and we understand that National Highways are considering how this could be addressed. The Applicant will continue to work with National Highways to agree a way forward.</p>	<p>This is an ongoing issue that has yet to be resolved.</p> <p>National Highways' position is that there is no scheme in this location in its current plans (as has been assumed by current Vissim modelling prepared by the Applicant), nor funding allocated. The current mitigation is not adequate to enable the junction to operate safely and effectively. National Highways' view is a scheme to mitigate the impact on the slip roads is feasible and will need to be in place before the development can proceed. National Highways has submitted a Technical Note to both the Applicant and the Examining Authority outlining the need for additional mitigation and potential solutions.</p>

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		<p>This would cause potential road safety issues. If proposals are predicated on the northbound hard shoulder being used to provide a fifth lane and nearside 'lane drop' then this again is an invalid assumption.</p>		
National Highways RR-1076	Transport Assessment	<p>Flows exiting to the A1081 New Airport Way do not differentiate between movements continuing along the A1081 through the London Road interchange and those exiting via London Road to London Road Roundabout. As the nearside of the three lanes on this length of the A1081 is marked and signed for Harpenden/St Albans, and the outer two lanes for Luton and the airport, it is not inconceivable that signage would be extended to M1 Junction 10 to avoid weaving between the exit from M1 Junction and the London Road exit.</p> <p>This could influence the lane choice taken by drivers on both slip-roads, with the nearside lane in both cases potentially underutilised, certainly by airport bound traffic. This potential outcome is not reflected in the LinSig modelling, with resultant usage of the three lanes on each slip-road relatively 'balanced' in both peak hours, particularly on the northbound slip-road.</p> <p>Given the forecast level of overall exit flow to the A1081 is expected to be circa 5,000vph in the AM peak hour, and just over 4,000vph in the PM peak hour, and due to the complexity of the road layout, National Highways wishes to see a signing strategy which includes gantries above the northbound exit slip and approaching or above the southern M1 overbridge on the</p>	<p>The Applicant discussed lane choice and utilisation at M1 J10 during recent engagement with NH, where sensitivity tests were undertaken to define volumes of eastbound traffic travelling to London Road or continuing along the A1081. The tests differentiated these movements as part of an updated O/D matrix and demonstrated that queuing on the northbound off-slip would not block back onto the M1 mainline. NH were satisfied with the modelling outcomes.</p> <p>A comprehensive signage strategy would be required in the vicinity of M1 J10 to accommodate the proposed changes to the highway layout. These changes to signage would be picked up as part of any ongoing detailed design, with the Applicant willing to continue working alongside NH in developing an acceptable solution.</p>	<p>The signage strategy would need to also include the use of two gantries. This needs to be included in the DCO. Drafting of a suitable requirement will need to be agreed between the parties.</p>

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		<p>circulatory to direct drivers to avoid a need for weaving and lane changing after exiting M1 Junction 10. Whilst this is a matter for detailed design, it is important that the principle is conditioned in the DCO to ensure the safe and efficient operation of the junction following implementation of the works.</p>		
National Highways RR-1076	Transport Assessment	<p>NH is concerned about the Phase 2b work to the A1081 (Drawing 0029) as the centre lane on the A1081 approach may currently be used by drivers routing to the M1(S) via the main roundabout give-way line or the M1(N). However, with the proposed layout this centre lane becomes a left turn only to the M1(S). Based on the predicted right turn flows to the M1(N) in this scenario, these are shown to be 1,259vph (AM) and 2,379vph (PM). As such, confining all the M1(N) bound traffic to the outer lane would not be desirable given the PM demand, so it is considered that the centre lane would need to retain the option of 'split' destinations.</p>	<p>The Applicant agreed in recent discussions with NH that minor changes such as these could be accommodated within the design as the project progresses into detail design. Sensitivity testing using LinSig has highlighted that such a change would not negatively affect the modelled performance of the junction. The Applicant would be willing to continue working alongside NH in developing the options.</p>	Noted.
National Highways RR-1076	Transport Assessment	<p>It is noted that each of the Do Minimum modelling scenarios contains 18mppa (current demand) at Luton Airport, regardless of the year. This means that VISSIM models have not been presented for the committed transport network with proposed development demand.</p> <p>For future years, the M1 Junction 10 infrastructure proposals are included, but the associated demand growth since the baseline</p>	<p>The Applicant has described the approach to do-minimum modelling above in previous responses.</p> <p>Reference case modelling was not requested but would only be for the existing junction and for the existing configuration and would therefore be difficult to provide as a direct comparator.</p>	<p>The impact of development trips is not presented in isolation, therefore, it is not possible to confirm that the DCO proposals fully mitigate development trips. This is particularly the case given that the Vissim model gridlocks before the end of the simulation and that Luton Rising has not updated the mitigation strategy following their acceptance that</p>

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		<p>year is not included. For example, for 2043, all phases of the improvement scheme are included, but demand growth associated with Phase 1 and Phase 2a are not. This obscures the ability to identify the impact of the proposed development on the existing highway network as it would be at that time.</p> <p>To summarise, the main concern with both peak hour scenarios in 2043 (and so the final Phase 2b mitigation proposals at M1 Junction 10) is the lack of network resilience or identified 'spare' capacity to deal with problems if driver behavior and effective utility of all available capacity provided is not perfect.</p> <p>Furthermore, in the absence of any comparative 'Reference Case' modelling for 2043, as described in the previous paragraph, it cannot be determined as to whether this out turn situation is better or worse than a situation without the airport expansion and 'committed' growth. In other words, the 'nil detriment' or ideally betterment situation cannot be evaluated, as only the 'development case' can be judged. Lack of network resilience as forecast in only a 'development case' is therefore a concern.</p>	<p>With regard to spare capacity, it is evident from all of the modelling undertaken that M1 Junction 10 would fail to operate in the dominant scenarios even in the absence of the DCO scheme. There are clearly baseline issues which result in network problems and a lack of resilience cannot be attributed to the DCO proposals. The DCO proposals mitigate the impacts of the proposed scheme.</p>	<p>ALR on the M1 is not a committed scheme.</p>
National Highways RR-1076	Transport Assessment	<p>Further to the comment on Section 5 relating to car parking capacity. It is noted that additional coach, taxi and car parking drop off/parking spaces are being provided as part of the development proposals. It is indicated that the requirements for the number of spaces is</p>	<p>The baseline principle for the future surface access facilities is that the facilities provided in 2019 were what was required to support 18mppa.</p>	<p>Has the expansion of offsite car parking been considered as part of the assessment for Luton Airport expansion? It was noted during the open floor hearings at the DCO examination that there is a car park supplier who was in</p>

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		<p>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.</p> <p>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.</p>	<p>The calculation of the future year surface access facilities including car parking were calculated using the method described in previous responses.</p>	<p>discussion for some time with the applicant/Luton Borough Council regarding additional offsite car parking. If further offsite car parking is brought forward then this has the potential to have an impact on the SRN – M1 Junctions 9 to 11.</p>
National Highways RR-1076	Transport Assessment	<p>Paragraph 8.3.20 sets out that; 'this highway mitigation is embedded into design of the Proposed Development and the assessment has been undertaken on the basis that the mitigation would be required in line with the assessment phases of passenger growth to 21.5 mppa, 27 mppa and 32 mppa. The actual phasing of their delivery will be determined by the on-going monitoring with delivery of any mitigation adjusted to address the requirements of the scheme.'</p>	Noted.	No comment.
National Highways RR-1076	Transport Assessment	<p>As previously set out in this response (under Section 1), a comprehensive monitoring methodology is required by National Highways, including the trigger points for the implementation of the proposed upgrades to M1 Junction 10. Paragraph 8.4.6 notes that CAA data has been used to derive the origin and destination of passenger trips. Could it be confirmed which year of CAA data has been used to derive the baseline?</p>	2016 CAA Origin-Destination data was used.	Noted.

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National Highways RR-1076	Transport Assessment	<p>An additional requirement for a maintenance location bay at M1 Junction 10 needs to be addressed within the mitigation design. At present, National Highways' Technology Managing Agent Contractor (Tech MAC) utilises the hatched area on the northern overbridge of the circulatory carriageway to park vehicles involved in maintaining technology assets at the junction.</p> <p>The mitigation design involves the hatched area becoming a traffic lane to create the required additional capacity. The requirement to be able to park maintenance vehicles safely will remain and the facility will need to be re-provided as part of the mitigation design. The ideal location for a new parking bay (layby) would be on the eastern side of the gyratory, close to the A1081 exit.</p>	<p>Noted.</p> <p>The Applicant notes it would be possible to accommodate a maintenance parking layby on the eastern side of the gyratory.</p> <p>This can be included within the scheme layout as the detailed design progressed.</p>	<p>The signage strategy would need to also include the use of two gantries. This needs to be included in the DCO. Drafting of a suitable requirement will need to be agreed between the parties.</p>
National Highways RR-1076	Transport Assessment	<p>9. Modelling Methodology</p> <p>It is stated in Paragraph 9.4.8 that some transport schemes would be further modified, and this is described in Chapter 9. It is not clear in which section of Chapter 9 this is contained. Clear details of the modifications should be provided to NH.</p> <p>Paragraph 9.4.9 indicates that NH would need to consider measures to address the existing constraints on the M1 corridor. It is acknowledged that there is no committed scheme but noted that any upgrade is likely to be a smart motorway as opposed to full motorway widening. It is also noted that 'through discussion with National Highways a capacity upgrade has been included in the 2043 Future Baseline between M1</p>	<p>Whilst Table 9.2 of the Transport Assessment – Part 3 of 4 (Chapters 9 - 10) [APP-205] sets out the East Luton Study (non-airport related) highway improvements, the Applicant notes that Table 8.1, section 8 of Transport Assessment – Part 2 of 4 (Chapters 5 - 8) [AS-123] -sets out the proposed off-site highway mitigation measures, which include improvements to the East Luton Study measures.</p>	<p>Noted.</p>

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		Junctions 9 and 10.'		
National Highways RR-1076	Transport Assessment	<p>As set out in the earlier comments in this response due to the Government announcement a smart motorway (ALR) in this location has been ruled out.</p> <p>Furthermore, as noted, there is no committed scheme for this location included in the current RIS, nor a pipeline scheme for RIS3/4, and it should not be assumed that this will be in place.</p>	<p>The Applicant undertook scenario testing in chapter 14 of the Transport Assessment – Part 4 of 4 (Chapters 11-16) [APP-206]. This considered the impacts of the Proposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded in the sensitivity test the mitigation strategy continues to mitigate the impacts of the scheme.</p>	<p>In relation to the proposed mitigation for the M1 Junction 10. The following paragraph of the Department for Transport Circular 01/2022 should be noted;</p> <p><i>'29. New connections and capacity enhancements to the SRN which are necessary to deliver strategic growth should be identified as part of the plan-making process, as this provides the best opportunity to consider the cumulative impacts of development (including planned growth in adjoining authorities) and to identify appropriate mechanisms for the delivery of strategic highway infrastructure. However, there cannot be any presumption that such infrastructure will be funded through a future RIS. The company will therefore work with local authorities in their strategic policy-making functions in identifying realistic alternative funding mechanisms, to include other public funding programmes and developer contribution strategies to be secured by a policy in a local plan or spatial development strategy. And</i></p> <p><i>52. The scope and phasing of necessary transport improvements will normally be</i></p>

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				<p><i>defined by the company in planning conditions that seek to manage development in line with the completion of these works. In such circumstances, modifications to the SRN must have regard to the need to future-proof the network, while its delivery may require a funding agreement between the development promoter and the company.'</i></p> <p>This is particularly pertinent in relation to National Highways position on the additional mitigation that is required to the M1 Junction 10 slip roads.</p>
National Highways RR-1076	Transport Assessment	<p>10. Highway Capacity Assessments</p> <p>NH has reviewed the Transport Assessment and the VISSIM models submitted by Arup, the Applicant's surface access consultants, to review Chapter 10. The following VISSIM models have been reviewed by Jacobs on behalf of National Highways:</p> <ul style="list-style-type: none"> • 2024 Do-Minimum (18mppa) • 2024 Do-Something Assessment Phase 1 (21.5mppa) • 2039 Do-Minimum (18mppa) • 2039 Do-Something Assessment Phase 2a (27mppa) 	Noted.	No further comment.

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		<ul style="list-style-type: none"> • 2043 Do-Minimum with assumption of capacity increase on M1 (18mppa) 2043 Do-Something with assumption of capacity increase on M1 and Assessment Phase 2b (32mppa) 		
National Highways RR-1076	Transport Assessment	<p>Following an initial review of the VISSIM models, it was identified that Arup had included a capacity upgrade (ALR) on the M1 in the 2043 forecast scenarios. This included increasing vehicle speeds on the M1 and provision of an additional lane on both the northbound and southbound carriageways. NH reiterated its advice that there is no committed capacity upgrade for the M1 at this location. As there is no committed scheme on the M1, no capacity upgrade should be included in the VISSIM models, as per DfT TAG forecasting guidelines.</p>	<p>The Applicant undertook scenario testing in chapter 14 of the Transport Assessment – Part 4 of 4 (Chapters 11-16) [APP-206]. This considered the impacts of the Proposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded in the sensitivity test the mitigation strategy continues to mitigate the impacts of the scheme.</p>	<p>It is advised that the core scenario in the Transport Assessment is unsound as it includes ALR on the M1.</p>
National Highways RR-1076	Transport Assessment	<p>In response to this, Arup prepared a new set of VISSIM models (11/04/23) without a capacity upgrade on the M1. Referred to by Arup as 'sensitivity test' models, they simulate the existing layout of the M1.</p> <p>Therefore, this review of the VISSIM information in the Transport Assessment also includes the following information:</p> <ul style="list-style-type: none"> • 2023-04-04 VISSIM Sensitivity test – No M1 ALR. Sent to Jacobs by Arup via email on 06/04/23. • 2043 Do-Minimum without M1 capacity increase (18mppa). Sent to Jacobs by Arup via 	Noted.	<p>It is advised that the core scenario in the Transport Assessment is unsound as it includes ALR on the M1.</p>

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		<p>file transfer on 11/04/23.</p> <ul style="list-style-type: none"> • 2043 Do-Something Assessment Phase2b highway infrastructure (32mppa). Sent to Jacobs by Arup via file transfer on 11/04/23. 		
National Highways RR-1076	Transport Assessment	<p>Forecast Flows</p> <p>Paragraph 9.1.2 of the Transport Assessment (TA) states that one purpose of the strategic model is to provide growth forecasts for the VISSIM model. However, Figure 9.1 shows the forecasting process for the VISSIM model, which features no input from the strategic model. Para 9.4.12 states 0.5% growth per annum has been added to motorway through traffic, with 0.25% growth per annum to internal roads. Section 14 of the TA indicates that the CBLTM-LTN SATURN flows are around 5% higher than VISSIM demands. This leads to concern that the VISSIM model may have been prepared using an underestimate of forecast demand.</p> <p>It is requested that ARUP present a comparison of VISSIM, CBLTM-LTN and TEMPRO forecast demands for each modelled scenario. This should include overall network demand, flows on the M1 and turning counts at Junction 10.</p>	<p>It is unclear where the reference in Section 14 is taken from, however, the Applicant has previously provided traffic flow information on flows through J10 to NH which shows that the demand through J10 is higher in the VISSIM modelling than in the strategic model. This can be provided again.</p>	<p>Table 14.32 and paragraph 14.4.7 indicate sensitivity test demands between 4.3% and 6.6% higher than the core scenario demands. The model results presented in Tables 14.33 and following are commensurate with slightly higher demands.</p>
National Highways RR-1076	Transport Assessment	<p>Configuration of Modelled Scenarios</p> <p>As noted previously, each of the Do Minimum scenarios contains 18mppa at Luton Airport, regardless of the year. This means that VISSIM models have not been presented for the committed</p>	<p>The Do Minimum scenarios are based on the existing level of consented development at Luton Airport, i.e. 18mppa. As such, the Do Minimum scenarios do not include any additional highway mitigation in the future year scenarios as it assumes there is no</p>	<p>The impact of development trips is not presented in isolation, therefore, it is not possible to confirm that the DCO proposals fully mitigate development trips.</p>

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		transport network with proposed development demand. This obscures the ability to identify the impact of the proposed development on the existing highway network.	airport expansion.	
National Highways RR-1076	Transport Assessment	<p>Model Assignment</p> <p>Analysis of the assignment convergence and stability in the VISSIM models has not been presented within the Transport Assessment. Observation of the models and subsequent communication with Arup indicates that the assignments have not been converged or stabilised for each modelled scenario. This gives rise to some erroneous assignment in the vicinity of Junction 10. As an example, Figure 1 illustrates unrealistic route choice with regard to the left turn from the A1081 to the southbound on-slip at M1 Junction 10.</p>	<p>A sensitivity test was undertaken by the Applicant to achieve a higher level of convergence for the 2043 full development scenarios. The results of the test revealed that the models successfully met the 95% convergence criteria for four consecutive runs for all scenarios in 2043. Additionally, when comparing the original model to the higher convergence model runs, no significant differences were observed in terms of overall network performance, journey times, and the performance of M1 J10. No further concerns in this regard were raised by National Highways.</p>	<p>Assignment cannot be transferred between model scenarios using this approach. TAG does not provide provision to undertake a modelling exercise in this way. It is not the case that assignment for a scenario with higher demand will automatically be acceptable in a lower demand scenario. Supply affects assignment as well, not just demand. Microsimulation models such as VISSIM are particularly sensitive with regard to assignment, this is an aspect of the model that requires detailed consideration in each scenario.</p>
National Highways RR-1076	Transport Assessment	<p>Network Coding</p> <p>A review of the VISSIM model coding indicates that the capacity of the southbound merge at Junction 10 may have been overestimated. Figure 2 shows that the physical capacity of the merge has been overestimated, with vehicles overlapping lane markings and each other.</p>	<p>The layout of the southbound merge is identical to the layout agreed in the validated Base year model which has already been agreed with National Highways.</p> <p>No modifications have been made to the layout or driving behavior for any of the future year tests or this sensitivity test.</p> <p>It is important to note that in the existing (2017) AM peak hour there is existing</p>	<p>Network coding at the southbound merge could be improved.</p>

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			<p>queuing occurring at this location and it was calibrated with great attention to replicate actual behaviour and queuing. Additional journey time surveys were undertaken at this location to ensure that the model is calibrated and validated well against observed behaviour.</p> <p>No further concerns in this regard were raised by National Highways.</p>	
National Highways RR-1076	Transport Assessment	<p>Figure 3 below indicates the impacts of unrealistic speed distributions in the model. Vehicles emerging from the southbound off-slip at Junction 10 have desired speeds of up to 69mph, whilst vehicles on the main carriageway have maximum speeds set as low as 18mph. Within Figure 3, the vehicles in yellow on the southbound carriageway have vehicle speeds capped at around 41.9 mph, whilst the vehicles highlighted in green are those emerging from the slip road that have a desired speed of up to 69mph. Within the model, this means that vehicles in the left-hand lanes are coded to travel up to 50 mph faster than the right hand 3 lanes. This leads to unrealistic undertaking and merging. Overall, it is considered that the capacity of the southbound merge has been over estimated within the VISSIM model.</p>	<p>The Do Something impacts should be compared back to the Do Minimum impacts. These have shown that generally speaking, the Do Something with the scheme and mitigation performs in line with or better than the Do Minimum.</p> <p>It should also be noted that Green Horizons Park (GHP) has only been included in the Do Something (given the link to AAR) but not the Do Minimum and therefore the Do Something always over estimates the scheme impacts.</p>	<p>The current coding of the model leads to erroneous behaviour at the southbound merge and on the M1. This impedes assessment of options to improve the southbound merge.</p>
National Highways RR-1076	Transport Assessment	<p>VISSIM Outputs Paragraph 10.2.34 of the Transport Assessment states that it is assumed that by 2043 there will be a scheme in place on M1 to 'unlock' the mainline and J10. However, as previously explained, there is not a</p>	<p>This is a baseline issue, and the Applicant will continue to work with National Highways to agree a way forward.</p> <p>Notwithstanding this, the proposed mitigation strategy for the junction as a whole provides</p>	<p>It is advised that the core scenario in the Transport Assessment is unsound as it includes ALR on the M1.</p> <p>The impact of development trips is not presented in isolation, therefore, it is not</p>

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		<p>committed scheme for this part of the M1. Neither is there a planned (pipeline scheme). Therefore, National Highways does not consider this to be a safe assumption. The assumption that an upgrade will be provided on the M1 means that the 2043 VISSIM models quoted in the Transport Assessment do not represent a realistic forecast scenario. Therefore, NH's confidence in the outputs from the 2043 VISSIM models is undermined. A PowerPoint presentation was prepared by Arup and issued to NH on 06/04/23, the purpose of which was to present the findings of the non-ALR VISSIM model tests. The overall network in this VISSIM data indicates that, without ALR, the model shows some congestion impacts during the AM period. The Phase 2b scheme does deliver an improvement in performance at the roundabout compared to the situation with no mitigation implemented. However, this benefit is limited by the fact that southbound merge is overloaded in both the Do Minimum and Do Something Models.</p>	<p>substantial benefits and the assessment of the scheme should be considered in its overall contribution to improving the operation of the network.</p>	<p>possible to confirm that the DCO proposals fully mitigate development trips.</p>
National Highways RR-1076	Transport Assessment	<p>It is noted that the VISSIM models demonstrate significant amounts of congestion in each of the model scenarios. This is in part due to the impact of off-network delays on the M1 main carriageway that are simulated in the model. Figure 5 shows the typical level of congestion in the 2043 DS models without the assumed ALR on the M1. This is illustrated by the purple colouring on the M1 southbound slip-road. Figure 5: 2043 DS AM No-ALR – Congestion</p>	<p>This is a baseline issue and the Applicant will continue to work with National Highways to agree a way forward. Notwithstanding this, the proposed mitigation strategy for the junction as a whole provides substantial benefits and the assessment of the scheme should be considered in its</p>	<p>The impact of development trips is not presented in isolation, therefore, it is not possible to confirm that the DCO proposals fully mitigate development trips.</p>

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		<p>on Southbound on-slip and blocking back through the Local Road Network.</p> <p>It is noted that in each of the 2043 non- ALR VISSIM tests, the southbound merge is over capacity and generates congestion. In the PM periods this congestion is sufficient to lock up the entire model.</p>	<p>overall contribution to improving the operation of the network.</p>	
National Highways RR-1076	Transport Assessment	<p>Summary of VISSIM Review Notwithstanding the issues identified with the VISSIM models, it appears that the Phase 2b Junction 10 roundabout layout can accommodate the demand that reaches it in the 2043 AM period. It is more difficult to draw a judgement from the VISSIM Model in the PM period due to the level of congestion, blocking and gridlock in these models. The VISSIM model indicates that with the Phase 2b layout in place the southbound merge at Junction 10 will be over capacity in 2043 with no ALR. This leads to extensive congestion and blockingback from the SRN to the Local Road Network. In the AM period, this appears to be in part due to capacity on the M1 main carriageway. Whilst in the PM period, the congestion appears to originally generate on the on-slip itself.</p>	<p>Noted.</p>	<p>No further comment.</p>
National Highways RR-1076	Transport Assessment	<p>The lack of a Do Minimum network with proposed airport demand from the previous airport upgrade phases makes it difficult to isolate the impact of development trips and therefore to establish whether congestion on the southbound merge is sufficiently mitigated. The configuration of modelled scenarios also makes it difficult to pinpoint the timing at which mitigation would be required in order to accommodate airport demand</p>	<p>The Do Something impacts should be compared back to the Do Minimum impacts. These have shown that generally speaking, the Do Something with the scheme and mitigation performs in line with or better than the Do Minimum. It should also be noted that Green Horizons Park (GHP) has only been included in the Do Something (given the link</p>	<p>The impact of development trips is not presented in isolation, therefore, it is not possible to confirm that the DCO proposals fully mitigate development trips.</p>

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		on the SRN.	to AAR) and not the Do Minimum and therefore the Do Something always overestimates the scheme impacts.	
National Highways RR-1076	Transport Assessment	Scenario Testing For comments on chapter 14 please also refer to NH's comments on chapter 10 above. Figure and Figure 14.2 show the AM and PMpeak comparison of traffic flows for the sensitivity test without ALR. NH request a table showing flow differences between the two scenarios.	The Applicant notes that flow differences are shown in Table 14.21 and 14.24 of the Transport Assessment – Part 4 of 4 (Chapters 11 – 16) [APP-206] for the AM and PM peak periods respectively	Noted
National Highways RR-1076	Transport Assessment	For several of the tables/figures (Figure 14.1, Figure 14.2 Figure 14.3, Table 14.21, Table 14.22, Table 14.23, Table 14.24 and Table 14.28) there are no units. Are these numbers in Passenger Car Units (PCUs) orvehicles? There is also no indication of whether they are actual or demand flows. NH requires clarity on these points.	The Figures show PCUs/hour flow differences and the Tables are in vehicles per hour. All reported flows are 'actual'.	Noted
National Highways RR-1076	Transport Assessment	It is indicated in Paragraph 14.3.10 that the removal of the increased motorway capacity assumption, introduced to simulate ALR or a similar capacity upgrade, reduces traffic on the M1 corridor particularly in the southbound direction between Junction 10 and Junction 9 with traffic diverting to other local routes. NH would like to understand what impact the removal of ALR has on Junction 9 as the text indicates that traffic reduces on the mainline carriageway and diverts to the local road network. Therefore, it is likely that more traffic will leave the M1 at Junction 9 without a	The Applicant undertook scenario testing in chapter 14 of Transport Assessment – Part 4 of 4 (Chapters 11 – 16) [APP- 206] . This considered the impacts of theProposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded inthe sensitivity test the mitigation strategy continues to mitigate the impacts of the scheme.	Ongoing issue, National Highways will comment on the rebased model once this is available.

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		<p>mainline capacity enhancement being in place. Furthermore, congestion on the M1 in the vicinity of Junction 10 may lead to additional traffic using the A5 as an alternative between Junctions 9 and 11 or 11a. The potential scale for these movements and the potential impacts should be understood.</p>		
National Highways RR-1076	Transport Assessment	<p>15. Residual Impacts It is noted that monitoring will be managed through the Airport Transport Forum (ATF) and by the Travel Plan Co-Ordinator role to be established as part of the Framework Travel Plan (FTP) and future Travel Plans. NH indicated previously that it would like to be part of the ATF and the FTP steering groups in order that they are able to monitor the impacts of the development. However, resource input into these forums will need to be addressed as part of discussions about protective provisions (see later section of this Annex).</p>	<p>The Applicant is committed to working with local stakeholders through the Travel Plan process. The Applicant has produced a Framework Travel Plan that outlines the process of engagement for future Travel Plan (produced every 5- years). This includes consultation through the Airport Transport Forums, which provides a mechanism to engage with National Highway on monitoring and data collection as well as future mitigation proposals. The Applicant welcomes further discussion on this and clarification of resource input required.</p>	<p>Could the details of the ATF steering group meetings be provided? National Highways has not been invited to attend any of these meetings to date. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.</p>
National Highways RR-1076	Transport Assessment	<p>Appendix B: Strategic Modelling - Model Specification Report It should be noted that the latest M2 TAG unit was released in May 2020, the latest unit M4 was published in April 2020 and the latest data book is dated January 2023. NH requests to know the differences between the M2 TAG old and new versions and the likely impact on the Proposed Development?</p>	<p>The Applicant notes that the M2 TAG was current at the time of preparing the Strategic Modelling: Model Specification Report in 2018. It is anticipated that there are likely to be little or no impact on the development of the variable demand model.</p>	<p>Response noted and accepted as it stands. However, TAG M2 addresses more than variable demand modelling. M2.1 is concerned with 'Variable Demand Modelling' and M2.2 is concerned with 'Base Year Demand Matrix Development'. It is possible that the representation assumed only the former.</p>

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National Highways RR-1076	Transport Assessment	<p>Appendix I: Outline Transport Related Impacts Monitoring and Mitigation Approach National Highways is particularly interested to understand how the Proposed Development traffic will be distinguished from the background traffic on the SRN, and at M1 Junction 10 in particular.</p> <p>Paragraph 2.2.1 'monitoring of growth (in traffic volumes) due to increases in airport related vehicular traffic would be required at a number of physical locations both at the airport and externally on the highway network.'</p> <p>As set out the response to Chapter 1 above, comprehensive details of the proposed methodology should be set out in the Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA). There is insufficient detail provided for NH to accept the monitoring and delivery approach to highway capacity intervention on the SRN.</p>	<p>Noted.</p> <p>Whilst the OTRIMMA as set out in the Transport Assessment Appendices – Part 3 of 3 (Appendices G – M) [APP0202] sets out the principles for ongoing monitoring, the TRIMMA is being developed in more detail that will set out the triggers and approach.</p> <p>This will be shared with National Highways in due course.</p>	<p>Noted. The TRIMMA should include a significant amount of detail in order to give National Highways comfort that the impacts of the Luton Airport expansion on the SRN will be monitored to determine that the SRN is still operating safely and efficiently.</p> <p>At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation;</p> <ul style="list-style-type: none"> • Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue for several years post full occupation to confirm that the impacts do not change over time • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National Highways time to attend meetings. Given the comprehensive nature of the monitoring this is labour intensive and National Highways does not have the resources to fund monitoring for developers schemes

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				<ul style="list-style-type: none">• Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends• Details of how the Applicant will distinguish between airport and non-airport related traffic is required.• Details of how junction capacity will be monitored is required, ie how will the Applicant confirm that the mitigation that they have put in place for the SRN is effective• Details of how the triggers/thresholds for mitigation should be confirmed• Surveying for only one week for a development of this size is nowhere near sufficient. There can be significant fluctuations week by week, several weeks should be undertaken as a minimum to ensure that the surveys represent a neutral, average time period

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				<ul style="list-style-type: none"> It is unclear how the voting process will work for mitigation. Will the LA's be voting for whether mitigation is required on the SRN and National Highways voting for mitigation on the LRN? This is illogical as each consultee has their own concerns
National Highways RR-1076	Need case	<p>THE NEED CASE (TR020001/APP/7.04) National Highways has reviewed the Need Case and discussed the airport demand forecasts with Arup and York Aviation on 15 June 2023. It is concluded that the forecasts are sound and sufficiently robust.</p>	National Highways confirmation that the aviation demand forecasts are sound and sufficiently robust is welcomed.	Noted and agreed.
National Highways RR-1076	Traffic and transportation	<p>FRAMEWORK TRAVEL PLAN (FTP) (TR020001-000845-7.13) The FTP provides high-level information for the proposed structure and approach to deliver a series of Travel Plans (TPs) to support the implementation phases contained within the DCO application and deliver the surface access strategy as the airport expands.</p> <p>The FTP makes reference to the overarching (TR020001-000844-7.12) Surface Access Strategy and (TR020001- 000840-7.08) Green Controlled Growth (GCG) Framework, but does not provide specific details of key elements needed in a TP e.g., actual targets, specific measures to be implemented, monitoring methods.</p>	<p>Baseline data for passenger and staff travel has been subject to considerable variation over recent survey years.</p> <p>Therefore, the Applicant will set Targets with the latest CAA air passenger travel data and once the first staff survey has been completed post DCO approval.</p> <p>The Framework Travel Plan [AS-131] sets out how Targets will be set within the first future TP. The scope of Targets may be revisited when developing the first TP to best reflect the latest survey results.</p>	National Highways will need to be consulted on the CAA data used and agreement of targets, as well as mitigation, for each iteration of the Travel Plan.

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		As stated in paragraph 1.2.1 of the FTP '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.'		
National Highways RR-1076	Traffic and transportation	<p>In the first instance, this approach will need to be secured through the DCO or via a subsequent planning condition (i.e., a S.106 agreement). In this case, NH will also need to be consulted on the approval of each TP produced, which should be produced in line with prevailing policy and best practice and include, but not limited to;</p> <ul style="list-style-type: none"> • The identification of targets for trip reduction and modal shift • The measures to be implemented to meet these targets • The timetable / phasing for the implementation of the travel plan measures • The mechanisms for monitoring and review • The mechanisms for reporting • The remedial measures to be applied where targets are not met • The mechanisms to secure variations to the travel plan following monitoring/reviews • Contact details of the appointed key individual responsible for the delivery of each travel plan e.g. Travel plan coordinator 	<p>The Applicant and Operator are currently developing a suitable and effective funding mechanism that best responds to Sustainable Transport Opportunities.</p> <p>Luton Borough Council, as the relevant planning authority, will have final approval of each TP and the proposed Targets over its five-year duration, following engagement on the TPs with the relevant highway authority.</p>	National Highways will need to be consulted on the agreement of targets as part of the overall Requirement 30 of the Draft Development Consent Order.

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National Highways RR-1076	Traffic and transportation	<p>The overall FTP structure is consistent with the Government Aviation Policy Framework (APF, 2013), which is an appropriate starting point to inform the evolving Airport Surface Access Strategies (ASAS).</p> <p>However, the FTP is very high-level and does not provide sufficient detail for agreement on specifics such as targets, measures and monitoring at this stage. In addition to above, the FTP sections have been reviewed with the following observations and recommendations.</p>	<p>Baseline data for passenger and staff travel has been subject to considerable variation over recent survey years.</p> <p>Therefore, the Applicant will set Targets with the latest CAA air passenger travel data and once the first staff survey has been completed post DCO approval. The Framework Travel Plan [APP-229] sets out how targets will be set within the first future Travel Plan (TP).</p> <p>Baseline data for passenger and staff travel has been subject to considerable variation over recent survey years.</p> <p>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. The toolbox approach set out in the FTP 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.</p>	National Highways will need to be consulted on the CAA data used and agreement of targets, as well as mitigation, for each iteration of the Travel Plan.
National Highways RR-1076	Traffic and transportation	2. Policy Reference should also be made to the DfT Circular 01/2022 Strategic Road network and the delivery of sustainable development requirement for 'development promoters must put forward clear targets and commitments to	Noted.	No comment.

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		<p>manage down the traffic impact of development and maximise the accessibility of and within sites by walking, wheeling, cycling, public transport and shared travel. Targets for achieving a modal shift to sustainable transport will need to be subject to sustained monitoring and management by an appointed travel plan coordinator. Advice on preparing and monitoring travel plans is contained in the planning practice guidance.'</p>		
National Highways RR-1076	Traffic and transportation	<p>At this stage the FTP does not provide clear targets for each of the phased TPs to be delivered and how they will contribute to reducing the traffic impact on the SRN. NH will need to agree the targets and how they will be monitored prior to the approval of each phased TP going forward.</p>	<p>The Airport Transport Forum (ATF) is comprised of representatives from local authorities, National Highways, and public transport operators (it is intended that forum attendance is encouraged from National Highways going forward). The ATF is an advisory body and exists 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.</p> <p>The Surface Access Strategy [APP- 228] and Framework Travel Plan [APP-229] set out the role and responsibilities of the bodies and organisations associated with Travel Plan governance.</p> <p>The ATF will provide feedback to the airport operator on the proposed content of each TP and work with the airport operator on activities and issues in relation to the surface transport serving the airport.</p>	<p>National Highways will need to be consulted on the CAA data used and agreement of targets, as well as mitigation, for each iteration of the Travel Plan.</p> <p>Could the details of the ATF steering group meetings be provided? National Highways has not been invited to attend any of these meetings to date. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.</p>

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National Highways RR-1076	Traffic and transportation	Paragraph 2.1.2 makes reference to an Airport Transport Forum (ATF). Luton has an active ATF and, as indicated later in the FTP, NH should be invited to join this ATF as a statutory consultee.	The Airport Transport Forum (ATF) is comprised of representatives from local authorities, National Highways, and public transport operators. It is intended that forum attendance is encouraged from National Highways going forward. Further information can be found within the Transport Assessment [APP-203 toAPP-206] and Surface Access Strategy[APP-228] .	Could the details of the ATF steering group meetings be provided? National Highways have not been invited to attend any of these meetings to date. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.
National Highways RR-1076	Traffic and transportation	<p>3. Surface access at the airport today</p> <p>Acknowledging the TP is a framework, it does not provide any real detail of the existing surface access situation. This is covered in other documents to a certain extent, however, the FTP is effectively a standalone document to inform future phased TPs and at this stage it should demonstrate what the base situation is for the following as a minimum:</p> <ul style="list-style-type: none"> • Current sustainable access arrangements • Where/ how staff and passengers typically travel to the airport • Current modal share <p>Paragraph 3.1.2 makes reference to the Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) as an Appendix to the Transport Assessment [TR020001/APP/7.02]. Separate comments have been made on this document and should be referred to, noting at this stage, there is insufficient detail provided for National Highways to accept the monitoring and delivery approach to highway capacity</p>	The Applicant notes comments on detail in the Outline Transport Related Impacts Monitoring and Mitigation Approach [APP-202] . The ongoing development of TRIMMA will set out additional detail on the proposed monitoring regime.	<p>The Applicant to provide further detail through the ongoing development of the TRIMMA.</p> <p>At the TRIMMA meeting (19/09/23) National Highways raised the following questions which will require confirmation;</p> <ul style="list-style-type: none"> • Why is it proposed to stop monitoring when the airport throughput reaches 31.5mpp? For any development (particularly of this significant size) monitoring should continue for several years post full occupation to confirm that the impacts do not change over time • For both the Sustainable Transport Fund (STF) and the ATF National Highways requests that the Applicant funds National

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		interventionson the SRN.		<p>Highways time to attend meetings. Given the comprehensive nature of the monitoring this is labour intensive and National Highways does not have the resources to fund monitoring for developers schemes</p> <ul style="list-style-type: none"> • Why does the STF stop once airport reaches 32mppa? This means that the mode share is likely to change resulting in more car trips. Which then relates to the fact that monitoring is required for significantly longer to confirm that the impacts on the SRN don't change once funding for sustainable travel interventions is reduced/ends • Details of how the Applicant will distinguish between airport and non-airport related traffic is required. • Details of how junction capacity will be monitored is required, ie how will the Applicant confirm that the mitigation that they have put in place for the SRN is effective • Details of how the triggers/thresholds for mitigation should be confirmed

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National Highways RR-1076	Traffic and transportation	4. Surface access targets The FTP provides an outline approach to how targets will be set in the future but stops short of confirming what the targets will be. NH will need to agree the eventual proposed targets prior to the approval of each phased TP.	<p>As part of the Proposed Development the Applicant is seeking to achieve a decrease in the non-sustainable passenger and staff mode share, setting increasingly ambitious Limits through the Green Controlled Growth Framework (GCG) [APP-218] in line with airport passenger growth, with additional Targets set over and above these Limits to incentivise even greater ambition for sustainable travel.</p> <p>Mode share Limits are clearly set out in the GCG, and mode share Targets will be set at an appropriate level (always further reaching</p>	National Highways will need to be consulted on the CAA data used and agreement of targets, as well as mitigation, for each iteration of the Travel Plan.

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			<p>than GCG Limits) through the development of Travel Plans in future.</p> <p>Encouraging passengers to access the airport by bus and coach is an important part of achieving both Limits and Targets, and as such a new coach station is proposed at Terminal 2. The detailed design for the coach station will be developed at the appropriate time, following grant of development consent.</p>	
National Highways RR-1076	Traffic and transportation	Paragraph 4.1.2 makes reference to the initial targets being set using “the latest Civil Aviation Authority (CAA) air passenger travel data and the most recent staff survey. It is accepted that the operator will pursue an equivalent alternative source of survey data (e.g., undertaking their own departure surveys) should the CAA survey not be available for a particular annual cycle, at any stage in the future, for whatever reason.”	The Applicant has clearly set out mode share Limits in the GCG [APP-218] , and mode share Targets will be set at an appropriate level (always further- reaching than GCG Limits) through the development of Travel Plans in future.	National Highways will need to be consulted on the CAA data used and agreement of targets, as well as mitigation, for each iteration of the Travel Plan.
National Highways RR-1076	Traffic and transportation	When available, NH should agree to the use of this data and the related targets toprior to approval to confirm an acceptable approach has been applied. Paragraph 4.1.4 advises that any targets will exceed the relevant surface access limits set out by the separate Green Controlled Growth (GCG) Framework e.g. achieve higher levels of sustainable transport mode share than the limits. Given these limits are available in a separate document it would be useful to have these included in the FTP as a starting point and for benchmarking against the eventual targets set	The Framework Travel Plan (FTP) [APP-229] does not include the GCG Limits to avoid confusion. The mode share targets set in the FTP are more ambitious and separate to the Limits in the GCG as such it is not considered appropriate to include them in the FTP.	National Highways will need to be consulted on the CAA data used and agreement of targets, as well as mitigation, for each iteration of the Travel Plan.

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		in the future phased TPs.		
National Highways RR-1076	Traffic and transportation	Paragraph 4.1.5 includes the two headline management targets that each phased TP must include. These comprise passenger and staff mode share % and are consistent with the surface access related GCG limits. From the perspective of the SRN, NH will require additional information on how these % targets translate into actual reductions in airport generated vehicle numbers (including freight), on and around the SRN, how these will be monitored and how they relate to any proposed highway interventions to be set out in the TRIMMA.	The Travel Plan will contain information on targets and reductions as well as future monitoring arrangements for sustainable transport options. The TRIMMA will focus on highway mitigation and interventions.	National Highways will need information on how Travel Plan % targets, for each iteration, translate into actual reductions in airport generated vehicle numbers (including freight) as well as providing details on monitoring and mitigation. This should be provided in each Travel Plan and / or the agreed TRIMMA
National Highways RR-1076	Traffic and transportation	5. Interventions and measures The long list of measures and proposed toolkit approach for future phased TPs to draw upon is noted. Prior to approval, each phased TP submitted should provide a more detailed assessment of the proposed measures to be implemented and the level of sustainable mode shift they are expected to deliver. Any subsequent monitoring reports should, where possible, clearly identify how each measure contributes to sustainable mode shift and vehicle reduction on and around the SRN.	The Applicant will address this through the 5-yearly Travel Plan monitoring as outlined in the Framework Travel Plan [APP-229] . If targets are not being reached, then the toolkit of interventions will be examined to select the most appropriate mitigation measure to change travel behaviours. This will be done in consultation with the LPA. The TRIMMA will manage highway mitigation matters. More information on highway monitoring and mitigation will be provided in	Noted and accepted on the basis that National Highways will need to be consulted on the agreement of targets, as well as the effectiveness of different mitigation measures, for each iteration of the Travel Plan.

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			the TRIMMA which is currently being developed.	
National Highways RR-1076	Framework travel plan	<p>6. Survey and monitoring results National Highways should be consulted on the proposed staff survey, monitoring and data collection methodology prior to the approval of each subsequent phased TP to ensure a consistent approach is adopted. Any changes to the way data is collected and monitored from previous surveys, should be advertised with supporting reasons. As stated above, the targets only relate to % changes. NH will require additional information on how these translate into actual reductions in airport generated vehicle numbers (including freight), on and around the SRN, how these will be monitored and how they relate to any proposed highway interventions to be set out in the TRIMMA.</p>	<p>The operator will engage NH through the ATF. Travel Plans will contain the results of ongoing monitoring and consider comments and views from stakeholders including the ATF on their content and level of ambition. Each TP will set Targets for the next five-year period.</p> <p>They will also identify the interventions and measures to be implemented as part of the TP, including details of their delivery and how each will contribute towards achieving specific Targets. The TRIMMA is under consideration and will be reported on in due course; it will contain detail about how junctions and airport-related traffic will be monitored and reported on, as well as the governance associated with the delivery of mitigation measures.</p>	<p>Could the details of the ATF steering group meetings be provided? National Highways has not been invited to attend any of these meetings to date. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.</p>
National Highways RR-1076	Framework travel plan	<p>7. Monitoring, management and governance of the TP As stated above, the proposed staff survey, monitoring and data collection methodology for each subsequent phased TP should be reviewed by NH prior to approval and to ensure a consistent approach is adopted. Any changes to the way data is collected and monitored from</p>	<p>The operator will engage with National Highways (NH) through the ATF on matters related to the Travel Plan and wider surface access issues, including monitoring processes and results.</p> <p>NH have also been offered a role on the Green Controlled Growth (GCG) Technical</p>	<p>Could the applicant please confirm who at National Highways was offered offered a role on the Green Controlled Growth (GCG) Technical Panel?</p> <p>Could the details of the ATF steering group meetings be provided? National Highways has not been invited to attend</p>

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		<p>previous surveys, should be set out with supporting justification. The FTP should also monitor and report on how any % changes translate into changes in actual vehicle numbers (including freight) generated by the Airport on and around the SRN. As highlighted in Table 7.2, NH should be engaged as a member of the ATF with the development and approval of any new phased TP. The contact details of the nominated TP Coordinator should be provided to NH.</p>	<p>Panel for surface access, which will enable NH to review and comment on matters relating to Green Controlled Growth, which will include the annual submission of monitoring reports (which include surface access monitoring data).</p>	<p>any of these meetings to date. Can steps be taken to include National Highways or a process set out clearly in writing for National Highways to seek membership.</p>
National Highways RR-1076	Environmental Statement	<p>ENVIRONMENTAL STATEMENT (TR020001-000765) 1. Introduction A statement refers to consultation throughout the Environmental Impact Assessment (EIA) process: 'Dialogue was maintained between the Applicant, the Planning Inspectorate and prescribed consultees in relation to the scope of the EIA throughout the EIA process to ensure a proportionate assessment that meets the requirements of the EIA Regulations was produced. A dialogue was also maintained with relevant stakeholders throughout the process in relation to non-material changes to scope. The agreed scope and any confirmed changes in scope are reported in each individual aspect chapter of this ES. In reality, there has been little to no engagement from the Applicant with NH regarding the scope of the EIA. National Highways did not receive any communication on the PEIR following its comprehensive response to the Statutory Consultation in May 2022. A meeting was held with the Applicant's environmental consultants in January 2023, following repeated requests by National</p>	<p>Paragraph 1.6.11 of Chapter 1 Introduction [APP-029] of the Environmental Statement (ES) is a general statement which covers the entire ES and all stakeholders. Responses to each consultation exercise, including responses from NH, are recorded in the relevant consultation reports at subsequent consultation or with the application. The NH representatives at the meeting mentioned in the comment were content that their comments be addressed in the ES submitted.</p>	<p>The responses from the Applicant are noted.</p>

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		Highways but no new information was provided, with a general explanation that the detail would be contained within the Environmental Statement (ES).		
National Highways RR-1076	Environmental Statement	<p>4. The proposed development The M1 Junction 10 upgrade works are classified as 'Off-site Highway Interventions' and are described as being restricted to within existing highway boundaries except for the construction compound. The proposed development chapter describes the specific work numbers, according to phase, for the M1 upgrades:</p> <p>6e(n) Phase 1, 'Widening to the northbound off-slip to provide a third lane on the approach to the roundabout, with the widening accommodated in existing verge and embankment. Widening to the western circulatory carriageway to provide four circulating lanes, with this widening accommodated in the existing landscaped area on the inside of the roundabout. Amendments to the exit from the roundabout onto the A1081, to allow three lanes to diverge from the roundabout. This widening would be accommodated within existing verge area.'</p> <p>6e(o) Phase 2a, 'Widening to the A1081 westbound carriageway to enable two left turn lanes to continue onto the M1 southbound on-slip, where widening is also proposed.'</p> <p>and 6e(p) Phase 2b, 'Widening of the western circulatory carriageway</p>	<p>A detailed design exercise has not been undertaken for the proposed mitigation measures at M1 J10, and as such there are currently no plans which set out specific areas of vegetation to be removed. However, all of the proposed works at each of the phases would remain within the existing highway boundary with the exception of the proposed temporary construction compound located south-west of J10 to the north of Half Moon Lane.</p> <p>It is anticipated that the occupation of the compound would be temporary as shown in the Land Plans and Crown Land Plans [AS-011], i.e. during the construction works period which itself will be defined as part of the ongoing detailed design process.</p>	Noted and accepted.

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		<p>to provide five lanes. Realignment of the A1081 exit to enable three lanes to exit roundabout onto A1081, with segregated left turn lane removed and junction of southbound off- slip signalised. Provision of two southbound merging lanes onto M1 through All-Lane Running'</p>		
National Highways RR-1076	Environmental Statement	<p>For Phase 1, 6e(n) is confirmed in the work order description above to fall entirely within the existing highway soft estate.</p> <p>However, the Phase 2a and 2b (6e(o) and 6e(p)) works do not specify this. The areas of land proposed for the Off-site Highway Interventions appear to be described as falling entirely within the highway limits, in all locations other than an area of land to the west of junction 10 of the M1 and immediately to the north of Half Moon Lane. Land use in this location comprises arable farmland and scrub woodland. It is expected that this land-take will be temporary for the duration of the construction period only. On review of the ES, it is not clear what the nature of temporary and permanent land take will be across the proposed junction upgrade works, i.e., plans depicting land parcel ownership, specific loss of vegetation and boundaries of works restricted to the highway estate. High-level reference to 'Off-Site Highway Interventions' state that all works occur within highway estate boundaries, however specific work order descriptions do not explicitly confirm this. Confirmation of the nature of temporary and permanent land take across the proposed junction upgrade works is required.</p>	<p>A detailed design exercise has not been undertaken for the proposed mitigation measures at M1 J10, and as such there are currently no plans which set out specific areas of vegetation to be removed. However, all of the proposed works at each of the phases would remain within the existing highway boundary with the exception of the proposed temporary construction compound located south-west of J10 to the north of Half Moon Lane.</p> <p>It is anticipated that the occupation of the compound would be temporary, i.e., during the construction works period which itself will be defined as part of the ongoing detailed design process.</p>	Noted and accepted.

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National Highways RR-1076	EnvironmentalStatement	Management and operation of the construction compound, such as any Section 61 applications, expected Traffic Management arrangements, and site lighting (in the absence of other street light sources on Half Moon Lane) should be detailed.	The Code of Construction Practice referred to in Chapter 4 [APP-031] and provided as Appendix 4.2 to the ES [APP-049] describes the proposed measures to manage environmental effects of construction including Section 61 application, traffic management and lighting.	Noted and accepted.
National Highways RR-1076	EnvironmentalStatement	The construction compound, located on fallow farmland field, is variously referred to within the ES as 'Compound 6', but with other references also to Compounds 7, 14 and 15. It is unclear whether this refers to distinct phases of the construction period to be sited within the same compound boundary, or whether these are differing locations. This is not described clearly in the assessment reports. Therefore, confirmation is sought.	The Construction Method Statement and Program Report referred to in Chapter 4 [APP-031] and provided as Appendix 4.1 to the ES [APP-048] sets out the potential location for construction compounds during the construction period of the Proposed Development. During Phase 1 construction compound 6 (J10/M1) will be a self-contained construction compound that would be used over different phases to carry out highways works to Junction 10. During Phase 2a construction compounds 14 and 15 (Junction 10 M1) will be a construction compound from Assessment Phase 1 re-used in Assessment Phase 2a and a new self-contained compound to east side of roundabout is provided. During Phase 2b construction compound 7 (Junction 10 M1) will be a construction compound reused from Assessment Phase 2a.	Noted and accepted.

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National Highways RR-1076	Environmental Statement	<p>5. Approach to the assessment The assessment makes note of the proposed ALR smart motorway upgrade: 'The Core Planning Case assumes the M1 south of Junction 10 will be upgraded to Smart Motorway, or other method, to provide all lane running and address current and predicted congestion on this stretch of the M1 in the future baseline without the Proposed Development, as agreed with National Highways. This sensitivity test assumes that all lane running is not delivered and the M1 continues to operate as is. Surface access traffic modelling has been undertaken and a quantitative assessment has been undertaken for those environmental aspects that employ traffic data where relevant'.</p>	Noted.	No comment.
National Highways RR-1076	Highways mitigation	<p>As previously described within the Transport Assessment, this assumption is no longer valid, due to the recent Government announcement on Smart Motorway schemes. Please see comments on the Transport Assessment in relation to highways modelling at the beginning of this Annex.</p>	<p>The Applicant undertook scenario testing in Chapter 14 of the Transport Assessment [APP-206]. This considered the impacts of the Proposed Development in the scenario where no upgrade to the M1 mainline was included and this confirmed that in the absence of ALR and as concluded in the sensitivity test the mitigation strategy continues to mitigate the impacts of the scheme.</p>	<p>This is an ongoing issue that has yet to be resolved and National Highways do not agree with the Applicant's position. In particular, the removal of works to the slip roads has not been modelled in Vissim.</p> <p>National Highways' position is that there is no scheme in this location in its current plans (as has been assumed by current Vissim modelling prepared by the Applicant), nor funding allocated. The current mitigation is not adequate to enable the junction to operate safely and effectively. National Highways' view is a scheme to mitigate the impact on the slip roads is feasible and will need to be in</p>

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				place before the development can proceed. National Highways has submitted a Technical Note to both the Applicant and the Examining Authority outlining the need for additional mitigation and potential solutions.
National Highways RR-1076	Agricultural land and soils	6. Agricultural land quality and farm holdings. In reviewing the PEIR it was noted that this chapter did not refer to agricultural land affected by the M1 Junction 10 works, only to the 'main application site' and areas of 'offsite planting'. The ES chapter specifically references 'agricultural land required to construct off site Highway Interventions to the west of Junction 10 of the M1 and immediately to the north of Half Moon Lane'. Clarification of the agricultural land affected by the M1 Junction 10 works is required.	Noted, the document was updated in response to feedback and addressed. There is no permanent land take for the construction compound at J10 of the M1. Further detail on land to be impacted temporarily and/or permanently is shown in Chapter 6 Agricultural Land Quality and Farm Holdings [APP-033] of the Environmental Statement (ES) and the Land Plans and Crown Land Plans [AS-011] .	Noted and accepted.
National Highways RR-1076	Agricultural land and soils	It is noted that 'approximately 0.6ha of agricultural land to the west of Junction 10 of the M1 highway intervention would be affected by the Proposed Development, some of which is no longer being farmed'. However, there is a lack of clarity regarding which land parcels this affects, as the highway verges are non-agricultural land within the highway boundary (NH ownership).	Further detail on land to be impacted temporarily and/or permanently is shown in Chapter 6 Agricultural Land Quality and Farm Holdings [APP-033] of the Environmental Statement (ES) and the Land Plans and Crown Land Plans [AS-011] .	Noted and accepted.
National Highways RR-1076	Compounds	The precise footprint of the construction compound(s) is not clear, nor the nature of any permanent land-take. Clarification of which land parcels are affected by the Proposed Development, including the construction compounds, is required.	Further detail on land to be impacted temporarily and/or permanently is shown in Chapter 6 Agricultural Land Quality and Farm Holdings [APP-033] of the	Noted and accepted.

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			Environmental Statement (ES) and the Land Plans and Crown Land Plans[AS-011] .	
National Highways RR-1076	Biodiversity	<p>8. Biodiversity</p> <p>The biodiversity chapter assessed a range of potential impacts on protected species, habitats, and sites. With regard to the M1 J10 works, only the loss of neutral semi-improved grassland was applicable, wherein 0.53 ha would be lost as part of these works. Within the Arboricultural Report, it is noted that off-site highway works are not included within the assessment and 'are to be considered separately;' no inclusion is given therefore to tree retention or facilitative clearance/removal, and it is unclear where or if the impacts on the highway tree estate are assessed. Given the nature of the existing junction circulatory being surrounded by mixed deciduous woodland cover, it would be assumed some level of tree and scrub clearance would be required to accommodate the widening and/or construction compound establishment. This should be clarified.</p>	<p>Tree removal has not been identified within the M1 J10 to date, and it is anticipated that the mature tree line to the west of the site compound would be retained. The site clearance drawings (LLADCO-3C-ACM-WHS-SCL-DR-IN-0001 to 03) within Appendix 4.1 Construction Method Statement and Programme Report [AS-082] identify areas of other vegetation clearance within semi-improved neutral grassland with encroaching scrub. Pre-construction surveys will be conducted following detailed design.</p>	Noted and accepted.
National Highways RR-1076	Biodiversity	<p>Biodiversity mitigation delivered on highway estate should conform to the specific targets and objectives outlined in the NH Biodiversity Plan, which includes enhancement under improvement schemes. The latest Biodiversity Plan, published in 2015 and valid through 2020 (under Highways England at the time) has since been withdrawn. The Applicant should cross-check the proposals</p>	<p>Where mitigation is required to be provided within the Highway Estate, the Applicant will seek to consult with National Highways to ensure alignment on published guidance available at the time.</p>	Noted and accepted.

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		against the strategic objectives of any updated NH Plan as the asset landowner, or through direct consultation.		
National Highways RR-1076	Water Resources and Flood Risk	<p>9. Climate Change Resilience The chapter notes that: 'All surface access transport infrastructure will be designed to EA guidance on flood risk assessments: climate change allowances (Ref. 9.59) and the principles set out in the Luton Local Transport Plan (Ref. 9.60). Where applicable, the highway design has been developed to the standards set within the Design Manual for Roads and Bridges (DMRB).'... 'All surface access assets will either be designed for the climatic conditions projected for the end of their design life, using appropriate design guidance where available or adaptive capacity will be built into the designs. The Drainage Design Statement (Appendix 20.4 of this ES [TR020001/APP/5.02]) accommodates for surface water flows during 1 in 100 years storm event, accounting for an increase in precipitation of 40% due to climate change.' In particular, National Highways requires that the final M1 Junction 10 design is or can be compliant with appropriate drainage standards and climate change scenarios as described above.</p> <p>13. Health and Community There is no reference to Pepperstock or Slip End, two settlements immediately west of M1 Junction</p>	<p>The final M1 Junction 10 design will be designed to be compliant with appropriate drainage standards and climate change scenarios. The detailed drainage design must reflect the principles of the Drainage Design Strategy under Requirement 13 of the Draft Development Consent Order [AS-067].</p> <p>As stated in the comment significant effects would not be expected at these locations. The study areas for this aspect, identified and agreed through Environmental Impact Assessment (EIA) scoping and engagement, are the areas in which potential significant effects have been identified for this aspect and were therefore included in the assessment. As significant effects are not expected, they are not in the study area and not specifically assessed. The areas are considered in other aspects of the EIA if appropriate.</p>	Noted and accepted.

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		<p>10. These two settlements are also outside the study areas shown on Figure 13.1. There is reference to a generalised wider study area, into which these two settlements would presumably fall. Significant effects would not be expected on Pepperstock or Slip End as a result of the SRN works, but there should be a justification as to why they are excluded from the core study area.</p>		
National Highways RR-1076	LVIA	<p>14. Landscape and Visual Impact The chapter specifically assesses the impact of the M1 Junction 10 construction compound and works on users of Bridleway Slip End BW1 and Half Moon Lane. These users are adjudged to be significantly affected during the construction period due to the temporary introduction of a compound and removal of visible vegetation. The combination of a high value visual receptor and high sensitivity but low adverse impact results in an overall significance of moderate adverse.</p>	Noted.	Noted and accepted.
National Highways RR-1076	PROW	<p>The nearby public right of way FP12 is shown on figures as being close to the M1 Junction 10 works but does not appear to be specifically assessed in the chapter. As a result of consultations in 2022 with Central Bedfordshire Council and the Applicant, two additional visual receptors affected by the M1 Junction 10 works were agreed for inclusion within the ES scope. There is no apparent reference to the additional receptors requested by the Council incorporated within the visual assessment chapter.</p>	<p>FP12 is to the south east of J10 of the M1. Users are not expected to experience impacts due to the Proposed Development therefore were not included within the assessment. The receptors considered within the landscape and visual assessment were agreed with Central Bedfordshire Council (CBC) and the wider LVIA Working Group and are described in section 14.4 of Landscape and Visual [AS-079] of the Environmental Statement (ES).</p>	Noted, including that BW1 is assessed, and accepted.

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	Noise	<p>Noise and Vibration. With regard to the M1 Junction 10 works, during construction: The nearest receptors to work areas are located approximately 100m away (to the west of the Junction 10 slip road). At this distance, construction noise from typical road work activities is unlikely to exceed the Lowest-Adverse-Effect- Level (LOAEL). Although the LOAEL is unlikely to be exceeded, mitigation measures secured in the Code of Construction Practice (CoCP) will ensure that construction noise is minimised at all times. Consequently, noise from assessment Phase 1 M1 (J10) works will be not significant. The same conclusion was also found for out of hours work and the other assessment phases. Out of hours work would be subject to a Section 61 application (as secured in the CoCP); it is expected that with the adoption of suitable mitigation measures the impacts would not be significant. Regarding construction traffic noise and vibration to the airport expansion site from access routed along the SRN, 'the primary access route to the Main Application Site would be via Junction 10 of the M1... [Construction traffic along this route would cause only] a negligible impact which is not significant'. For operational (permanent) effects, it is anticipated the effect would be negligible.</p> <p>It is assumed that this assessment examined only the effects of the construction of the highway improvements and did not include the effects of the construction compound. Confirmation of this is sought.</p>	<p>The methodology for the construction noise assessment is based on current industry standard approach and is presented in section 16.5 of Chapter 16 Noise and Vibration [AS-080] of the Environmental Statement (ES) and details of the works that are included in the assessment are presented in section 5 of Appendix 16.1 Noise and Vibration Information [AS-096] of the ES. As set out in this appendix, the assessment is based on reasonable worst-case activities that are likely to generate the highest noise levels during construction. In line with this methodology, the construction compound has not been assessed due to the relatively minor works required, limited duration of noisy works and distance to the nearest sensitive receptors. Measures included within the Code of Construction Practice [APP-049] will be sufficient to manage noise and vibration emissions from the construction compound.</p>	<p>Noted and accepted.</p>

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	Water Resources and Flood Risk	<p>20. Water Resources and Flood Risk. This chapter refers to 'M1 Junction 10 – small area of low surface water flood risk on the carriageway of the M1 northbound lanes' although the resultant effect was not deemed to be significant. The Highways England Water Risk Assessment Tool (HEWRAT) assessment has been undertaken for M1 Junction 10 and identified the requirement for additional surface water and pollutant management measures to manage impacts on water quality. It is noted that these measures will be specified during the detailed design stages and should be agreed with NH, in consultation with the local authority and Environment Agency (secured by surface and foul water drainage).</p>	<p>National Highways will be consulted on the drainage design for the highway works at J10 of the M1, as well as the planning authority and Environment Agency as described in Requirement 13 of the Draft Development Consent Order [AS-067].</p>	<p>Noted and accepted.</p>
National Highways RR-1076	OCTMP	<p>ENVIRONMENTAL STATEMENT APPENDIX 18.3 OUTLINE CONSTRUCTION TRAFFIC MANAGEMENT PLAN (TR020001-000765-5.02) The outline Construction Traffic Management Plan (CTMP) provides a high-level framework in advance of a detailed CTMP to be approved following DCO consent, once a lead contractor has been appointed and prior to commencement of works. In the first instance, this approach will need to be secured through a planning condition stating that prior to the</p>	<p>Noted</p> <p>Requirement 14 of the Draft Development Consent Order [AS-067] requires that development of any part of the Proposed Development may not commence until the Construction Traffic Management Plan (CTMP) for that part has been approved by the relevant planning authority, following</p>	<p>Noted.</p>

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		commencement of the development, a CTMP and phasing plan shall be agreed and approved in writing with the Local Planning Authority / highways authorities / National Highways.	consultation with the relevant highway authority.	
National Highways RR-1076	OCTMP	<p>The approved CTMP should include, and not be limited to, the following details:</p> <ul style="list-style-type: none"> • A detailed phasing plan of the development with updated estimates of construction and delivery vehicle volumes • Programme of traffic management measures, expected duration, supporting safety assessments / audits, updated traffic modelling and implications for all road users • Restricted routes for construction vehicles, including sensitive environmental receptors and communities • Plans for abnormal loads and mitigation • Strategy and commitment towards net-zero for construction traffic emissions • Strategic diversions, carriageway restrictions, speed limits and closures • Times, routes and means of access and egress for construction traffic and delivery vehicles (including any new access points and the import of materials and the removal of waste from the site) • Signing strategies and variable messaging • Footpath/footway/cycleway closures and impacts on vulnerable road users • Communications and engagement plan • Site compound, parking and access 	This comment appears to be a generic list of matters that should be considered when developing a CTMP. It has not been tailored to this specific application. All points in the list will be considered in the development of the CTMP.	Noted.

Interested Party and Examination Library Reference	Topic	Matters Raised in Relevant Representation (Verbatim)	Luton Rising's Response	National Highways Response
		<p>arrangements</p> <ul style="list-style-type: none"> • Safety measures • Risk management • Implications of seasonal traffic or significant events • Loading, unloading and storage of plant and materials used in the development • Details of the responsible person(s) to be contacted in the event of a complaint • Monitoring strategy for review, management and updating of the CTMP • The impact of potential conflicting construction periods, and therefore construction traffic and operative movements, if other applications within the area proceed While it is acknowledged that this is an outline CTMP, given the complexity of the scheme, more detailed information on the following would provide confidence that the impact of construction traffic is being given adequate consideration at this stage: <ul style="list-style-type: none"> • Identification of key stakeholders, likely impacts on different groups and proposed mitigation • Identification and map of sensitive sites or locations • Information and plans/map of proposed construction traffic routes • Information, plans/map of potential construction traffic restrictions and strategic diversion routes • Information, plans/map of potential traffic monitoring locations and baseline data to be collected • Sample selection of potential traffic management options likely to be considered or 		

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		<p>implemented and their potential implications for other road users</p> <ul style="list-style-type: none"> Existing safety and collision analysis of likely construction traffic routes. 		
National Highways RR-1076	OCTMP	Particular consideration will need to be given the construction methodology for the M1 Junction 10 mitigation works, as closures of the SRN may need to be required. In addition to above, the following clarifications are sought for each of the outline CTMP sections:	The Applicant agrees that particular consideration will need to be given the construction methodology for the M1 Junction 10 mitigation works.	A detailed methodology, with supporting modelling and appropriate mitigation, will need to be provided and agreed in the eventual CTMP to be secured through Requirement 14 of the Draft Development Consent Order.
National Highways RR-1076	OCTMP	<p>2. Local highway network</p> <p>An overview of network immediately adjacent to the airport is provided but it does not expand beyond this to the wider local network, particularly the SRN and adjoining routes likely to be affected by construction traffic and traffic management. It would be useful to have more information and mapping of any identified sensitive routes, areas or populations that could be restricted to construction traffic and have to potentially divert traffic onto the SRN. Further information on complex areas where traffic management could be needed on the SRN and adjoining local road network e.g. junctions, structures would be helpful.</p>	<p>The Applicant does not agree that this information should be provided in the CTMP. It is relevant information for the development of the CTMP but is included elsewhere in the application such as Chapter 18 Traffic and Transportation [AS-030] of the Environmental Statement(ES) and the Transport Assessment [APP-203 to APP-206].</p> <p>The CTMP should concentrate more on actions rather than background information that has already been provided, some of which may well be out of date as the construction of the airport proceeds.</p>	As a standalone document, this information should be provided in the eventual CTMP to be secured through Requirement 14 of the Draft Development Consent Order.

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National Highways RR-1076	OCTMP	3. Traffic Management Working Group (TMWG) It should be noted that the TMWG should also include emergency services. With reference to paragraph 3.2, it will be the responsibility of the Applicant and lead contractor to monitor the execution of the approved CTMP and report back to NH and others via the TMWG to advise on mitigation, updates to programme and any proposed changes to the CTMP for approval.	The lead contractor would consult with the emergency services regarding any closures/diversion that might affect their response times.	Noted.
National Highways RR-1076	OCTMP	4. Traffic Management Measures Paragraph 4.1.3 states 300 movements at peak but 'Construction Impacts on Strategic Road Network - Technical Note' (Arup, March 2023) talks of over 460 two-way movements during peak construction. Please clarify which is correct. Paragraph 4.1.3 translates this into 'the order of 30 HGV' maximum hourly movements based on 75% of all traffic being HGV and 75% of this traffic arriving in the 1000-1600 out of peak. If these assumptions are applied to 460 two-way movements, it would be nearer 43 HGV movements per hour out of the peak and 22 HGV movements per hour in the peak hours. Please can this be clarified. Section 4.2 Routing of Construction Traffic. More details of routing on the SRN and local adjacent network, construction traffic volumes and times of delivery will need to be agreed through the eventual approved CTMP prior to commencement. Section 4.3 Temporary Traffic Management. More details of temporary traffic management on the SRN and local adjacent network will need to be agreed in the eventual approved CTMP. This will need to set out an	The figure of over 460 two-way movements during peak construction matches the figure for the daily number of construction vehicles shown in paragraph 18.9.45 of Chapter 18 Traffic and Transportation [AS-030] of the Environmental Statement (ES) when it is factored by two to reflect total movements on the highway network. Thus the values in the Technical Note and the ES should be taken as a more accurate indication of peak traffic levels. The figure in the Outline Construction Traffic Management Plan [APP-130] would be superseded when the CTMP is produced and the lead contractor's work programme is known. Typical distribution of construction traffic movements during busiest quarter is shown on Inset 18.10 of Chapter 18 Traffic and Transportation [AS-030] , of the ES. The other matters raised in this comment will be addressed following the application being consented.	Noted.

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		<p>approved communication / engagement plan, design,safety, proposed duration of works and mitigation to limit their impact. Further modelling may be required, once traffic volumes and measures are known, to fully understand the implications on the SRN and other road users. This could include assessment of the local network where there could be implications for the safe operation of the SRN. Section 4.4 Managing Site Deliveries. An approved monitoring plan of volumes, type, delivery times and numbers of arrivals outside of allocated slots will be required. The monitoring plan will need to be agreed in the approved CTMP and all information to be made available to National Highways via the TMWG. Section 4.5 Abnormal Loads. More details for proposed abnormal loads, communication / engagement plans and proposed mitigation will need to be agreed in the approved CTMP. This will need to be monitored and all information to be shared with NH via the TMWG. 33 of 38</p>		
National Highways RR-1076	OCTMP	<p>5. Highway Safety With reference to Paragraph 5.1, more details will be needed of where construction traffic and associated traffic management measures could impact on highway safety and vulnerable road users. The approved CTMP will need to set out how vulnerable road users will be managed and mitigated. Analysis of existing safety and collision data on key construction routes should be provided in the outline CTMP and then updated in the approved CTMP.</p>	<p>Section 5.1 of the Outline Construction Traffic Management Plan [APP-130] relates to specific measures associated with the operation of construction vehicles and does not cover general road safety that is common to all road users. Road safety on the local highway network is covered in both the Transport Assessment [APP-203 to APP-206] and Chapter 18 Traffic and Transportation [AS-030] of the Environmental Statement (ES). The</p>	<p>The CTMP should mitigate any unacceptable temporary impacts on safety for other road users. As a standalone document, details of any unacceptable impacts and required mitigation should be provided in the eventual CTMP secured through Requirement 14 of the Draft Development Consent Order.</p>

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			<p>conclusion of the Transport Assessment [APP-204] is that there is not a problem for the operational phases therefore given the very much lower level of construction traffic and its general restriction to the PRN there is no need for a further assessment as suggested by National Highways. All works on the public highway that form part of the mitigation for the airport expansion will be subject to the full Road Safety Audit process.</p>	
National Highways RR-1076	OCTMP	<p>6. Monitoring of Construction Traffic Initial information should be provided now of proposed data to be collected, area of interest and specific locations within it. A detailed monitoring plan will then need to be agreed in the approved CTMP prior to commencement. This will need to include, but not be limited to:</p> <ul style="list-style-type: none"> • Agreed monitoring area of interest • Pre-construction data collection • Volumes, type and speed of traffic • Safety • Reducing carbon emissions • Wider impacts of traffic management <p>All data will need to be analysed and reported to National Highways via the TMWG.</p>	<p>Although the Applicant has proposed preferred construction routes in the Outline Construction Traffic Management Plan [APP-130], these are subject to agreement with the relevant highway authorities. Until they have been agreed the monitoring area of interest cannot be defined. The Traffic Management Working Group, which National Highways will be invited to join, will have the opportunity identify the issues that should be included in the monitoring process.</p>	Noted.
National Highways RR-1076	OCTMP	<p>ENVIRONMENTAL STATEMENT APPENDIX 18.4 OUTLINE CONSTRUCTION WORKERS TRAVEL PLAN (CWTP) (TR020001-000765-5.02) The Outline Construction Workers Travel Plan (CWTP) provides high-level information for the proposed approach to minimise the impact of</p>	<p>The final Construction Traffic Management Plan (CTMP) will be submitted for the approval of the relevant planning authority following consultation with the relevant highways authorities. This will include National Highways in relation to the Strategic Road Network (SRN). This is</p>	Noted and to clarify this requirement is secured under Requirement 15 of the Draft Development Consent Order.

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		<p>increased construction workers traffic on the road network, including the SRN, to support the roll out of implementation phases included in the DCO application as the airport expands. The Outline CWTP advises that a series of detailed CWTPs will be prepared for each phase of the proposed development. These will need to be approved following DCO consent, once a lead contractor has been appointed and prior to commencement of works. This approach will need to be secured through a planning condition stating that prior to the commencement of each phase of the development, a CWTP shall be agreed and approved in writing with the LPA / highways authorities / NH. Each approved CWTP should include, and not be limited to, the following details:</p> <ul style="list-style-type: none"> • Number of construction workers and shift patterns • Construction worker trip generation by mode and distribution • The identification of targets for trip reduction and modal shift • Access and parking arrangements to construction compounds • The measures to be implemented to meet these targets • The timetable / phasing for the implementation of the CWTP measures • The mechanisms for monitoring, review and for reporting • The remedial measures to be applied where targets are not met • The mechanisms to secure variations to the 	<p>secured by Requirement 14 in the Draft Development Consent Order [AS-005].</p>	

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		CWTP following monitoring and reviews <ul style="list-style-type: none"> • Contact details of the appointed key individual responsible for the delivery of each CWTP e.g., Lead Contractor and Travel Plan Coordinator 		
National Highways RR-1076	Protective provision	NATIONAL HIGHWAYS PROTECTIVE PROVISIONS National Highways is concerned that its interests are not adequately protected in respect of the proposed mitigation works at M1 Junction 10. National Highways will require their protective provisions to be included if there is to be any disapplication of any permits/licences/consents. It is normal practice for a set of “protective provisions” to be agreed as part of – or in advance of - the consenting process to ensure that the SRN is protected from a safety and operational efficiency perspective, users of the SRN are kept safe, and to safeguard the commercial interests of National Highways, as the government company responsible for its maintenance and operation.	Draft protective provisions have been received and are under review.	A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.
National Highways RR-1076	Protective provision	The Protective Provisions should address a range of matters, including; <ul style="list-style-type: none"> • The requirements for agreeing the detailed design • Prior approvals required and security, including those relating to safety • The processes required before access to the SRN can be permitted to construct the mitigation works 	Draft protective provisions have been received and are under review.	A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.

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		<ul style="list-style-type: none"> • Construction • Payments, including for design checking and approval, supervision and administrative support • Certification and approvals to enable the site(s) to reopen totraffic • A commuted lump sum for maintenance • What (if any) land/rights are required from National Highways; • What works (if any) are proposed to be carried out to the SRN; • What construction method is being carried out to complete theworks which interface with the SRN (for example, horizontal directional drilling or open cut trench); • Are there any site- specific considerations (for example, geotechnical sensitivities); • Is the proposed project likely to impact on a National Highways major projects scheme and if so, are there construction timetabling or operational to resolve; • What are the traffic and transport impacts that we object to; • Will the works require a Temporary Traffic Regulation Order (TTRO); • If the road in question is subject to a Design Build Finance and Operator (DBFO) contract and do we need the DBFO contractor to have specific rights in the protective provisions; and • In addition, it is noted that the Book of Reference includes thew temporary possession and use of 21 locations that are under National Highways freehold. There is no permanent land-take although land under National Highways 		

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		<p>freehold will be required for the widening of the carriageway. This needs to be ratified by legal advisers as part of agreeing the Protective Provisions. Further, there is currently no provision in the design for the maintenance bay described in the comments above in relation to Chapter 8 of the Transport Assessment, which may necessitate additional land-take.</p>		
National Highways RR-1076	Protective provision	<p>NH submitted a draft Protective Provisions document to the Applicant on 22 February with a request for it to be included in the draft Order. The Applicant advised that it was too late to be included in the draft Order as the application documentation had been locked down for submission.</p> <p>However, it is understood that the draft Protective Provisions were passed on to the Applicant's legal advisers for consideration and discussion with National Highways. Despite requests for engagement on this matter, no response has been forthcoming from the Applicant.</p>	Draft protective provisions have been received and are under review.	A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.
National Highways RR-1076	Protective provision	<p>Agreement to a set Protective Provisions is essential to enable National Highways to discharge its duties under the Infrastructure Act (2015) on behalf of the Secretary of State for Transport. It is requested that these are incorporated into the finalised DCO to afford National Highways with sufficient protection in respect of the safe operation of the SRN and its commercial position.</p>	Draft protective provisions have been received and are under review.	A meeting was held with the Applicant's legal advisers, BDB, on 21 September. National Highways' legal advisers, DLA Piper, will respond to the points discussed in writing.