

LONDON LUTON AIRPORT EXPANSION

ISSUE SPECIFIC HEARING 4 (ISH4)

POST HEARING SUBMISSIONS

HERTFORDSHIRE COUNTY COUNCIL, NORTH HERTFORDSHIRE DISTRICT COUNCIL, DACORUM BOROUGH COUNCIL, CENTRAL BEDFORDSHIRE COUNCIL

1. INTRODUCTION

- 1.1 This document sets out the post hearing submissions and summarises the oral submissions made jointly by Hertfordshire County Council, North Hertfordshire District Council and Dacorum Borough Council (together, “**the Hertfordshire Host Authorities**”), and Central Bedfordshire Council (“**CBC**”) (together, “**the Hertfordshire Host Authorities and CBC**”) at Issue Specific Hearing 4 (“**ISH4**”) held on 28 September 2023 in relation to Luton Rising’s (“**the Applicant**”) application for development consent for the London Luton Airport Expansion Project (the “**Project**”).
- 1.2 ISH4 was attended by the Examining Authority (the “**ExA**”), the Applicant, the Hertfordshire Host Authorities and CBC, together with a number of other Interested Parties.
- 1.3 Where the ExA requested additional information from the Hertfordshire Host Authorities and / or CBC on particular matters, or the Hertfordshire Host Authorities and / or CBC undertook to provide additional information during the hearing, the Hertfordshire Host Authorities’ and / or CBC’s response is set out in or appended to this document.
- 1.4 This document does not purport to summarise the oral submissions of parties other than the Hertfordshire Host Authorities and CBC, and summaries of submissions made by other parties are only included where necessary in order to give context to the Hertfordshire Host Authorities and CBC submissions in response.

- 1.5 The structure of this document generally follows the order of items as they were dealt with at ISH4 set out against the detailed agenda items published by the ExA on 19 September 2023 (the “**Agenda**”).
- 1.6 In addition, the Hertfordshire Host Authorities and CBC have included in this note, responses to the Supplementary Agenda Questions published by the ExA on 19 September 2023, where these are relevant to them.

2. **SUMMARY OF ORAL SUBMISSIONS MADE**

PINS' Agenda Item	Response
2. Supplementary agenda	
<p>ISH4.SA.03 Transport Modelling</p> <p>The Hertfordshire Host Authorities [RR-0558, RR-1119 and RR-0297] queried the proposed traffic calming measures. The Applicant responded, 'The Applicant has positioned the locations of the indicative traffic calming to help dissuade airport-related traffic from reaching villages in the first instance, however the Applicant is willing to work with local authorities in delivering</p>	<p>The Hertfordshire Host Authorities and CBC are concerned that the monitoring sites are insufficient to adequately reflect the airport traffic distribution and traffic monitoring in the area.</p> <p>The Hertfordshire Host Authorities and CBC have requested in their Principal Areas of Disagreement Summary Statements [REP2-058] an area-based strategy as the current approach assumes that all impacts can be mitigated with localised interventions. However, in rural areas this is unlikely to be the case as interventions to reduce traffic travelling through one village are likely to displace traffic to another village, therefore an area based approach to monitoring in the east is likely to be more appropriate.</p> <p>The assumption set out in the Applicant's Response to the Relevant Representations Part 2A of 4 (Local Authorities) [REP01-021], that airport related traffic will be dissuaded from reaching the villages in the first instance, therefore needs some further clarification for the Hertfordshire Host Authorities and CBC to have an understanding of how the initial locations for the proposed traffic calming have been decided.</p>

highway mitigation and local traffic calming schemes, subject to ongoing monitoring.'

Please can the Applicant clarify by signposting to the relevant section (page/ paragraph) of the Transport Assessment how it determined the locations of indicative traffic calming measures.

3. Transport Modelling in the Transport Assessment

- **The Applicant to provide a brief update on the ongoing work in relation to updating the transport modelling in line with Department for Transport guidance.**
- **Forecast Infrastructure Assumptions (including but not limited to; M1-A6 link, East West Rail and the Trip Distribution Plans).**

Forecast Infrastructure Assumptions

M1-junction 9-10 hard shoulder running - As highlighted in for example the Hertfordshire Host Authorities' Relevant Representations P01 paragraph 7.2.2 and 7.3.2 [**RR-0558, RR-1119, RR-0297**], the Hertfordshire Host Authorities and CBC are concerned that the Core Scenario includes highway improvements which are not committed, such as the M1 junction 9-10 hard shoulder running and major upgrades to the M1 Junction 10.

This scheme is not in the National Highways Road Investment Strategy programme. Removing this scheme from the modelling could have an impact on congestion levels and wider traffic routing

which is not currently reflected in the assessments, and the mitigation response could be different to that currently presented.

The Hertfordshire Host Authorities and CBC need further detail to be able to fully understand the impacts within their networks without these schemes. The applicant set out their proposed approach in 'Covid-19 Modelling Stakeholder Meetings 21-07-23' which AECOM/Arup had with Hertfordshire County Council, Central Bedfordshire Council and Luton Borough Council on 21st July 2023. It is understood that revised modelling to be submitted at Deadline 6 will be based upon the Scenario excluding an assumed Smart Motorways Scheme on the M1, and the Hertfordshire Host Authorities and CBC will review and respond to this updated modelling once provided.

This was one of the matters identified in the submitted CBC Principal Areas of Disagreement Summary Statement (PADSS) **[REP2-048]**, under the overarching heading of assumptions applied to the Core Modelling Scenario. This was also raised in the Hertfordshire Host Authorities' Written Representations **[REP1-069]** paragraph 2.2.6.1.1 and Table 3 Summary of Written Representation, Traffic and Transport and the Hertfordshire Host Authorities' Principal Areas of Disagreement Summary Statement **[REP2-058]** Table 1.

It is noted that in the Applicant's response to the CBC Local Impact Report, **[REP2A-005]**, it is stated that the 'submitted documents and associated mitigation strategy remain as the main application documents for consideration'. As noted in the Hertfordshire Host Authorities Relevant Representations **[RR-0558, RR-1119, RR-0297]** paragraph 7.4.10, the Hertfordshire Host Authorities Written Representations **[REP1-069]** paragraph 2.2.6.1.1 and Table 3 Summary of Written Representation, and the Hertfordshire Host Authorities' Principal Areas of Disagreement Summary Statement **[REP2-058]** Table 1, the Hertfordshire Host Authorities and CBC would have significant reservations over an approach in which any updated modelling continues to be treated as a sensitivity test and is merely compared to the current modelling results, rather than being treated as the Core Case. To date, the amount of detail, including assessment years and detailed metrics, has been significantly more limited when reporting scenarios outside the current assumed 'Core' scenario, and would not be considered detailed or comprehensive enough for the Local Highway Authority (LHA) to fully identify and assess impacts.

However, the Hertfordshire Host Authorities and CBC understand that this is to continue to be treated as a sensitivity test rather than the Core Scenario. A Scenario test has been run in the

model, which can be found in the Transport Assessment Chapters 9 and 10 [APP-205] and Environmental Statement Appendix 18.5. Insufficient data analysis is provided in the current documents. However, to date, the amount of detail, including assessment years and detailed metrics, have been significantly more limited when reporting scenarios outside of the assumed 'Core', and would not be considered detailed or comprehensive enough for the Local Highway Authority (LHA) to fully identify and assess the impacts. More detailed data and assessment of the revised Core Scenario that excludes this improvement should be provided to understand the impacts and mitigation in the wider local road network.

The Hertfordshire Host Authorities and CBC's position is therefore that the Core Scenario for the transport modelling should be refined to remove the assumed hard shoulder running improvement scheme. This should include access to all model files to enable easier interrogation of the impacts that are occurring and detailed plots with figures clearly labelled to fully understand the impact of the additional traffic on the road network. The Hertfordshire Host Authorities and CBC welcome the Applicant's confirmation that it will remove the hard shoulder running improvement scheme from the Core Scenario.

Notwithstanding the above, the Hertfordshire Host Authorities and CBC continue to question the reliance upon a number of third party highway infrastructure schemes, and in particular have concerns that the DCO, as worded, provides no certainty or control over delivery, no limitations upon the extent of airport development that could come forward prior to those third party schemes being delivered, and no requirement to provide alternate schemes in the event that the assumed third-party schemes do not come forward either in the timescales or in the form envisaged.

East-West Rail - As outlined in the Hertfordshire Host Authorities' Relevant Representations [RR-0558, RR-1119, RR-029] paragraph 7.3.3 and their Written Representations [REP1-069] paragraph 2.2.6.1.8 Table 3 Summary of Written Representation, paragraphs 18.7.37-40 of ES Chapter 18 (Traffic and Transport) [AS-030] under baseline conditions refers to East-West Rail but it is unclear whether any or all of this is included in the modelling. The Hertfordshire Host Authorities and CBC are of the understanding that the first section of East-West Rail is being built but other sections are not committed, so consider that these should not be included in the transport modelling core scenario.

Traffic Impacts in Hertfordshire - Additional detail should be provided by the Applicant in the Transport Assessment [APP-203; AS-123; APP-205; APP-206; APP200; APP-201; APP-202] and from the modelling about the traffic impacts in Hertfordshire, particularly for the Scenario test without the hard shoulder running which is the most realistic traffic scenario and is insufficiently detailed in the Transport Assessment. The Hertfordshire Host Authorities and CBC will review and comment on further information to be provided by the Applicant in this regard.

Trip Distribution Plans – As noted in the Hertfordshire Host Authorities' Principal Areas of Disagreement Summary Statement [REP2-058] the assumptions around the geographic distribution of London Luton Airport trips (all modes) are not adequately represented.

In particular, it is not possible to fully appreciate the share that travels through Hertfordshire, the forecasts and the impacts. Additional detail is sought on the geographic distribution of London Luton Airport trips (all modes) including the detail through Hertfordshire. The additional plots provided to date have no numbers attached to the bandwidths and it continues to be very difficult to assess potential impacts on specific Hertfordshire rural roads and the A505, A1081 and B653.

The Hertfordshire Host Authorities and CBC request full disclosure of information from the transport modelling, which would include access to all model files to enable more easy interrogation of the impacts that are occurring and detailed plots with figures clearly labelled to fully understand the impact of the additional traffic on the road network.

Covid-19 - It is noted and welcomed that the applicant is undertaking modelling updates to address the requirements of the Rule 9 letter with regards to the Impacts of COVID 19.

With regard to the update to the modelling taking into account COVID 19, it is unclear if this update will purely consider changes in traffic flows, or also take into account changes in modal share (which underpin the modelling work).

As detailed within the CBC Principal Areas of Disagreement Summary Statement [REP2-048], the Hertfordshire Host Authorities' Relevant Representations [RR-0558, RR-1119, RR-0297] paragraph 7.4.2, the Hertfordshire Host Authorities' Written Representations [REP1-069] paragraph 2.2.6.1.2 and Table 3, the Hertfordshire Host Authorities' Local Impact Report paragraph 7.3.24 [REP1A-003] and the Hertfordshire Host Authorities' Principal Areas of Disagreement

Summary Statement Table 1, the base mode share assumptions appear to be based upon public transport usage recovering to levels above the 2018 CAA mode share, in which 24% of staff used public transport, but with 2020 levels recorded at 5%. Likewise, the 2018 passenger mode share was recorded as being 33%, with the 2020 survey recording combined public transport mode share of 9%. As such the baseline 2027 level of 40% passenger public transport mode share appears to be similarly optimistic.

At the Preliminary Meeting on 10 August 2023 the Applicant indicated that further testing of the model was being carried out for review by National Highways in December 2023. The Hertfordshire Host Authorities and CBC reserve their position on this matter until they have been able to test and review this information and be satisfied that the Proposed Development will not result in unacceptable pressure and congestion occurring on the local road network in their respective areas.

In relation to Central Bedfordshire Council specifically, with direct reference to the forecast infrastructure assumptions included within the modelling work:

- There is a specific concern that the 'Local Plan' sensitivity test is considered to be more appropriate than the Core Scenario, as this included both the M1-A6 Link Road, and the associated North of Luton Development, whereas the Core Scenario appears to include the Link Road but exclude the associated development, which whilst possible, is considered to represent an extremely unlikely scenario.
- A further, and significant, concern is with regards to the inclusion of the East of Luton Highways Schemes in the forecast baseline. As detailed within the CBC Principal Areas of Disagreement Summary Statement [REP2-048], by including these infrastructure schemes within the forecast baseline, it is not possible to determine the degree to which the airport expansion is reliant upon the delivery of those schemes, or the points in time at which they would be required.

4. Off Site Highway Works

- **Proposed Highway Works to three junctions in Hitchin.**
- **Proposed Highway Works to Crawley Green Road and Wigmore Lane.**

- **Proposed Highway Works to Eaton Green Road.**
- **Proposed Highway Works to London Road South Roundabout**

The proposed highway mitigation schemes are in conflict with local policy for improving sustainable modal choice

As noted in the Hertfordshire Host Authorities' Local Impact Report (para 7.3.23) [REP1A-003], the mitigations (junction modifications) proposed in Hitchin are not acceptable. Though not yet finalised, the Applicant proposes only infrastructure-based interventions, designed to increase capacity for vehicular traffic. This conflicts with local plans and policies to enable and support active and sustainable travel, including the objectives of the Hertfordshire Local Transport Plan 4 (LTP4) and aspirations in local strategy documents such as the North Central Hertfordshire Growth and Transport Plan (2021) and North Herts Local Cycling and Walking Infrastructure Plan (2023). The proposed mitigations would have a negative impact on active travel in Hitchin and, at best, a neutral impact on bus services. The Hertfordshire Host Authorities and CBC consider that, at a minimum, the designs should be updated to increase safety and capacity for people walking and cycling, and lock in any additional road capacity for public transport through bus priority measures to improve reliability

The Hertfordshire Host Authorities and CBC would like the Applicant to engage with them to agree a more balanced mitigation strategy which is in line with the aspirations of the local transport strategies and includes plans with potential to free up capacity through modal shift of existing trips. Furthermore, the Hertfordshire Host Authorities and CBC would like to understand the size of the budget being offered for implementing all planned mitigations (separate to the reactive interventions envisaged through the TRIMMA), and be reassured that this will be adequate to deliver a comprehensive and effective mitigation strategy.

The mitigations currently proposed by the Applicant are relatively low cost capacity improvement measures. Whilst the Hertfordshire Host Authorities and CBC welcome further engagement on the scheme details, they would like assurance that if their preferred mitigation schemes are more expensive than those already proposed, the Applicant would still deliver the schemes as part of the mitigation for the application and that additional funding would be made available. The process for agreeing this is unclear.

In the Applicant's response to the LIR it is stated that discussions have been held with regards to the proposed highways mitigation, and that the applicant will continue to work alongside CBC (and

the Hertfordshire Host authorities) as the designs progress through to the detailed stage. The Hertfordshire Host Authorities and CBC would welcome such further engagement.

In respect of Central Bedfordshire Council specifically:

At the time of the hearing the Applicant had not responded to CBCs request in its Local Impact Report [REP1A-002] for a more detailed submission, inclusive of safety audits, to allow for CBC (and/or the Hertfordshire Host Authorities) to approve the principles of the scheme proposed (amongst several). Reference to Safety Audits being undertaken in due course is made, but without confirmation that this will be prior to the determination of the DCO application, and therefore at the appropriate stage in the Safety Audit Process, (noting that Stage One Audits are specifically intended to inform the planning application stage). The Applicant confirmed in the hearing that Safety Audits have been commissioned and CBC will review and comment on these once provided by the Applicant.

CBC also expressed concerns over the phasing of the London Road South Roundabout mitigation scheme when considering the levels of congestion and detailed within the submitted Transport Assessment [APP-203; AS-123; APP-205; APP-206; APP200; APP-201; APP-202], as referred to in the CBC Principal Areas of Disagreement Summary Statement [REP2-048]. Reference was made to more detailed modelling carried out and provided by the Applicant in June and August 2023. This modelling, carried out at an individual junction level, showed the operation of the junction worsening in each forecast year (2027, 2039, and 2043) and during both the AM and PM peak hours. CBC does not believe that this information has yet been submitted to the Inspectorate by the Applicant.

5. Parking

- **‘Fly parking’ – The Applicant to provide further detail on how this issue was originally determined and what, if any, additional mitigation is now proposed.**
- **On-site car parking including current utilisation of the on-site car parking (for staff and passengers) and the proposed staff parking.**

<p>'Fly parking'</p>	<p>The Hertfordshire Host Authorities and CBC have concerns regarding informal park and ride schemes, which have been an issue on other infrastructure projects.</p> <p>There is potential for informal and uncontrolled parking by staff and travellers within the communities to the south and west of the airport (Caddington and Slip End). This is an existing issue – the Hertfordshire Host Authorities and CBC would suggest that mitigation is imposed as part of any future expansion proposals through parking controls. The limited increase in on-site parking could drive additional demand for off-site parking and wider traffic impacts that have not been assessed. This is of concern to the Hertfordshire Host Authorities and CBC where there is potential for off-site parking arrangements to come forward as the airport expands.</p> <p>The existing issue of flyparking was referenced within the Slip End Parish Council Relevant Representations submission dated 20th June 2023, and also in the attached letters from the Parish Council to the applicant dated 9th December 2019 and 12th February 2021. This was also raised in the Caddington Relevant Representations dated 22nd June 2023 and the CBC Relevant Representations dated 23rd June 2023.</p> <p>This has also been a topic of discussion through the pre-application and application process and was highlighted again within the CBC Local Impact Report [REP1A-002].</p> <p>The matter of off-site parking continues to be an area where there has been very limited active engagement or acknowledgement of the issues. It was noted during ISH4 that there has been a more active recognition of the issue within Luton, with an identified 'Potential Area of Residential Parking Restrictions' identified within the submitted offsite highways works plans [AS-023], but no comparable plan or proposal has been put forward for the communities expected to be impacted within other local authority areas.</p> <p>The Hertfordshire Host Authorities and CBC welcome the comments from the ExA that the Applicant needs to work not only with Luton Borough Council but with all affected host authorities in relation to these issues.</p> <p>The Applicant responded to a query from the ExA related to the assessment of 'offsite' car parking, stating that this had been considered within the Transport Assessment. It would be appreciated if this matter could be confirmed by the Applicant and further detail provided with regards to how offsite car parking has been accounted for, as this would appear to conflict with the previous</p>
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	<p>position of the Applicant as set out in the Applicant's Response to the CBC Local Impact Report [REP1A-002], in it states that 'the Applicant is not considering additional off-site parking as part of the DCO application' [REP2A-005] paragraphs 5.11.31 to 5.11.35.</p>
<p>6. Monitoring</p> <p>Applicant to update on TRIMMA including how airport related traffic on the local highway will be monitored.</p>	
<p>Outline TRIMMA</p>	<p>As outlined in the PADSS [REP2-058], the TRIMMA is not currently considered to provide a sufficiently robust or binding mechanism for ensuring timely delivery of necessary highways mitigation, leading to significant concerns regarding funding, phasing and delivery. It also does not give the Hertfordshire Host Authorities and CBC certainty that any additional unforeseen impacts in the highway network in their respective areas will be addressed and funded.</p> <p>A meeting was held between the Hertfordshire Host Authorities and CBC and the Applicant on 19/09/2023 in which further information was shared with regard to the proposed monitoring approach, with the slides shared on 21/9/2023 for further consideration. Whilst this provided some further clarity, and appears to represent a positive approach to monitoring and mitigating the more remote and less foreseeable impacts of the development, the information provided did not address the more fundamental concerns that the Hertfordshire Host Authorities and CBC have over such a broad application of this approach.</p> <p>The Hertfordshire Host Authorities and CBC are concerned that all off-site infrastructure is to be covered by the TRIMMA process, which itself is not robustly secured or controlled through proposed DCO requirements. Essentially, this appears to allow for the future reconsideration and renegotiation of all of the offsite highway's mitigation proposed, which raises a number of areas of further and more detailed concern.</p> <p>The Hertfordshire Host Authorities and CBC are still considering the material presented by the Applicant in the meeting on 19th September and subsequently supplied via email circulation on 21st September, which it is understood has not yet been not formally submitted to PINS.</p>

	<p>Jethro Punter, Highways Development Team Leader for CBC, stated that further clarity should be provided by the Applicant with regards to the following:</p> <ol style="list-style-type: none"> 1) Information regarding how the interaction between the packages of highways works assumed in the forecast modelling would be captured by the TRIMMA process. 2) In terms of assumed delivery of the east of Luton schemes, how does TRIMMA process account for these? 3) In relation to the Schedule 9 outline TRIMMA– will a fuller document replace this as the proposed certified document? 4) As the wording of the Outline TRIMMA allows for alternate schemes to be provided, how does all of this tie into off-site works and the extent of the DCO redline (which is based upon the currently identified schemes)? <p>It was noted in the applicant’s response to point 2 above that the east of Luton schemes are being treated as committed, but the query remains with regards to how any delay in delivery or alteration of the East of Luton schemes would be dealt with via the TRIMMA process.</p>
<p>Mitigation management and monitoring</p>	<p>There is insufficient information about how the traffic impacts in Hertfordshire would be mitigated, monitored and managed. The Hertfordshire Host Authorities and CBC would like the applicant to explore more balanced ways to mitigate impacts, e.g., measures that will mode-shift non-airport related car trips in order to free up road capacity for the expected increase in airport-related car trips (e.g., enhanced bus services and priority).</p>
<p>7. Sustainable Transport</p> <ul style="list-style-type: none"> • Determination of future rail capacity and details on the discussions the Applicant has had with rail operators • Impact and usage of the DART • Details on the discussions the Applicant has had with bus and coach operators • Cycling and Walking 	

<p>Sustainable Transport Fund (STF)</p>	<p>The Hertfordshire Host Authorities and CBC would like greater clarity on how the STF will be used to deliver sustainable transport improvements (PADSS page 10) [REP2-058]. There is no substantial mention of this fund in the planning submission documents reviewed to date.</p> <p>A meeting was held with Applicant to provide more information and clarity on the Sustainable Transport Fund on 19/9/23 as part of pre-examination engagement with the highway authorities, with the presentation material subsequently shared with attendees on 21/9/2023. This material has yet to be fully reviewed by the Hertfordshire Host Authorities and CBC, and further comments may be made on this in due course.</p> <p>The following key outstanding issues / concerns of the Hertfordshire Host Authorities and CBC were identified following the meeting, noting that these are not final comments there may be additional concerns raised once the material has been fully considered:</p> <ol style="list-style-type: none"> 1) Promotion of a more proactive approach to implementation of measures to influence travel behaviours from the outset. It is proposed by the Applicant that the fund will take some time to build up through an on-site parking levy, however it would be appropriate to allocate funding to schemes that could influence travel behaviour from the outset, including pump-priming of bus services as this will be essential in influencing future travel behaviours. It would not be appropriate with the scale of proposed development to wait for the issues to arise and then direct funding at them, or to wait for sufficient funding to be available and then address the problem. 2) It is understood that the ATF (Airport Transport Forum) Steering Group will determine how the funding is spent on Sustainable Transport schemes that can be requested by all members of the Forum, each having a vote regarding the schemes/ measures put forward. The mechanism for allocating the funding each year is unclear as there may be equally important competing demands from several authorities at the same time but insufficient funding to cover them all. 3) The end-date for the fund and implementation of measures is on completion of the full expansion, this is not sufficient as it is important that the fund continues beyond the completion of the full airport expansion as the impacts and changes to travel behaviours will take some time to come through following the full expansion.
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	<p>4) The terms of reference of the ATF and Steering Group will be significantly different from the present arrangements, how will the time required to support this be funded by the Applicant.</p>
<p>Public transport investment in new / improved services</p>	<p>As per the CBC Written Reps [REP2-047] and Principal Areas of Disagreement Summary Statement submissions [REP2-048] , whilst the Applicant has set relatively challenging mode share targets (when considering the baseline), these goals have not been reflected in a related commitment to funding sustainable transport measures, in particular public transport (when considering CBCs areas of interest), with walking and cycling measures expected to fall more within the remit of Luton Borough Council. Following more recent engagement with the Applicant on the Sustainable Transport Fund (STF) it is understood that the funding of bus services would be through this mechanism. This means that there would be competition for the STF funds and that sufficient levels of bus services may not be secured: in a timely way to influence travel behaviour; for sufficient length of time to be able to influence travel patterns; whether the STF will provide a sufficient funding pot for all of the competing sustainable travel demands that may arise.</p> <p>There is very sparse detail on the potential bus services that may be needed to support the airport growth and the proposed mode share target, further detail is requested by the host authorities to gain a better understanding of this. There has been some recent engagement with the Applicant at a meeting held between the Hertfordshire Host Authorities and CBC on 19/9/2023 regarding the STF. However, as these discussions are at an early stage, further considering and understanding of the details is required before the Hertfordshire Host Authorities and CBC can form a view.</p>
<p>Rail capacity</p>	<p>The Hertfordshire Host Authorities and CBC are concerned that the original assessment was based on pre-Covid levels of service and forecasts for increases in network capacity. The effects of Covid -19 on patronage and forecast service levels have not been accounted for. Demand may not have fully recovered and train companies may not see their plans come to fruition due to cost-cutting. Unclear whether there is capacity on the existing and forecast networks and impacts on current passengers at stations in Hertfordshire and Central Bedfordshire.</p> <p>As referenced in the Principal Areas of Disagreement Summary Statement [REP2-058], the Hertfordshire Host Authorities and CBC have requested that the Applicant demonstrate that the</p>

	<p>worst-case forecast rail capacity has been assessed to show that the background growth in rail passenger trips and the growth of London Luton Airport can be accommodated.</p> <p>Updated forecast year road and rail forecasts are expected to be provided by the Applicant by the end of October 2023 as part of the modelling updates, with reporting during November and submission to the Examining Authority in December 2023 . The highway authorities will need to review any updated information and reserve any further view on this until these have been made available and interrogated further.</p>
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8. Framework Travel Plan

<p>Framework Travel Plan</p>	<p>Fiona Ross, for the Hertfordshire Host Authorities and CBC, notes that high level comments provided in the CBC Relevant Representation and Written Representation raised concerns regarding the robustness of the FTP and the assumptions that feed into the public transport provision for the development.</p> <p>Toolbox of measures needs further details regarding roles and responsibilities, funding, prioritisation of investment.</p> <p>The Applicant responded to these points in their response to CBC Relevant Representations and referred back to the comments in their response to CBCs Written Representations. The Applicant has had discussions with public transport operators, and as a result of these discussions the Applicant and operators will continue as part of the Proposed Development to ensure that sufficient emphasis is placed on public transport access to both terminals. The Applicant and airport operator are committed, through the future Travel Plans, to ensure that access to and from the airport by public transport is maximised.</p> <p>As the proposals are defined as a ‘toolbox’, this means there is no commitment to provide or fund individual schemes, as they remain options for future consideration. It is also noted that a large proportion of the interventions are detailed as being delivered in partnership with other parties. It is not made clear as to whether this includes the expectation of third-party funding for the related measures or interventions.</p> <p>At present, should targets not be achieved the FTP requires the consideration of further interventions and revised targets within the next round of Travel Plans. This would not appear to</p>
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	<p>represent a strong incentive to achieve the Travel Plan targets, with very limited sanctions in the event of targets not being achieved.</p> <p>This links back to agenda item 7.</p> <p>Clearly identify where the Applicant or the Operator has responsibility and the potential partner authority. This information could be provided within the Toolbox of measures. It would also be helpful to understand the potential cost range associated with implementation of each measure to ensure adequacy of the funding arrangement,</p>
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9. Green Controlled Growth – Surface Access Mode Share

<p>Mode share metric</p>	<p>As detailed in the CBC Written Representations [REP2-047], there is a concern that the only metric proposed for monitoring of surface access is mode share, as self-reported through passenger and staff surveys. There does not appear to be a differentiation in terms of recorded or reported time of travel, and as such there may not be a direct correlation between the metric being reported (total daily mode share) and the likely periods of greatest impact (peak network travel times).</p> <p>It also appears to be suggested that controls would not apply if failure is for reasons outside of the Airport Operator’s control (page 4, 4th para). Further expansion or clarity would be needed, as there are a number of matters which could be interpreted as being outside of the operators control and which would significantly influence the findings, i.e.:</p> <ul style="list-style-type: none"> • Rail capacity • Bus service capacity (with a heavy reliance upon operators meeting demands in terms of additional or revised services) • Passenger mode choice <p>There needs to be further clarity on the thresholds for intervention, the measures to be introduced if targets are not met, what sanctions are available, and how this would be linked to addressing the breach in question.</p>
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GCG surface access Thresholds and Limits	<p>As referenced in the Principal Areas of Disagreement Summary Statement [REP2-058], there could be a long time lag between detection of a breach in surface access controls and the halting of London Luton Airport growth. Localised impacts could be untenable for an extended period of time before any mitigating action is necessary.</p> <p>The Hertfordshire Host Authorities and CBC consider that a clearer mechanism is needed for detecting a breach and halting growth and implementing mitigation.</p>
GCG surface access mode share targets	<p>The GCG mode share targets for non-sustainable mode share (based on passenger Civil Aviation Authority (CAA) annually collected data) will not reflect any local situation, London Luton Airport growth may continue while the Hertfordshire network deals with additional unmitigated traffic impacts that are not detected through the GCG monitoring.</p> <p>As referenced in the Principal Areas of Disagreement Summary Statement [REP2-058], a commitment to more frequent monitoring is required (monthly) and the Applicant should demonstrate that the survey sample rate is for passengers is statistically sufficient to base the decisions.</p>
GCG surface access mechanisms for managing growth	<p>As referenced in the Principal Areas of Disagreement Summary Statement [REP2-058], there is an unclear relationship between GCG mode share, the TRIMMA and the Framework Travel Plan (FTP).</p> <p>If the GCG monitoring demonstrates that London Luton Airport is operating within the GCG Thresholds and Limits for surface access, the host authorities would expect the Airport Operator to still be committed to providing local mitigation improvements in relation to TRIMMA and the FTP, however the relationship and funding is not clear.</p> <p>The GCG proposals have been shared with the Hertfordshire Host Authorities and CBC, however further discussions are welcomed.</p>