

October 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.50 Applicant's Post Hearing Submission - Issue Specific
Hearing 4 (ISH4)**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.50



The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.50 APPLICANT'S POST HEARING SUBMISSION
- ISSUE SPECIFIC HEARING 4 (ISH4)**

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1 INTRODUCTION

- 1.1.1 This document contains the summary of oral evidence and post-hearing comments on the submissions of Luton Rising, a trading name of London Luton Airport Limited, (the Applicant) made by others at Issue Specific Hearing 4 (ISH4) held on 28 September 2023. Where the comment is a post-hearing comment submitted by the Applicant, this is indicated. The Applicant has included tabulated responses to each of the action points raised by the Examining Authority (ExA) for ISH4 published on 4 October 2023.
- 1.1.2 This document uses the headings for each item on the agenda published by the ExA on 19 September 2023 for ISH4.

2 AGENDA ITEM 1 - WELCOME, INTRODUCTIONS AND ARRANGEMENTS FOR THE HEARINGS

- 2.1.1 The Applicant, which is promoting a proposal to expand London Luton Airport (the Proposed Development), was represented at ISH4 by Rebecca Clutten, of Counsel, supported by the following members of the Applicant's team:
- a. Tom Henderson, Partner, BDB Pitmans, Legal Advisers to the Applicant;
 - b. Richard de Cani, Planning Advisor, Arup;
 - c. Matthew Rhodes, Associate Director/Transport Lead, Arup, Surface Access Lead;
 - d. Clive Posford, Technical Director - Transport Planning, Aecom, Strategic Transport Model;
 - e. Jagjit Riat, Associate Director - Transport Planner, Arup, Modelling and Design; and
 - f. Mark Day, Associate, Arup, Green Controlled Growth Lead.

3 AGENDA ITEM 2 - MATTERS ARISING FROM THE SUPPLEMENTARY AGENDA

- 3.1.1 The ExA opened ISH4 with reference to Agenda Item 2 and asked if the Applicant had any concerns in relation to the published supplemental agenda. The Applicant confirmed it was on track to meet Deadline 3 (D3).

4 AGENDA ITEM 3 - TRANSPORT MODELLING IN THE TRANSPORT ASSESSMENT

4.1 Update on ongoing work in relation to transport modelling

- 4.1.1 The ExA asked the Applicant to provide a brief update on the ongoing work in relation to updating the transport modelling in line with Department for Transport

(DfT) guidance. The Applicant requested a spreadsheet (**Rule 9 Response Cover Letter [AS-064]**) be displayed on the screen and for the Applicant to provide this information as a slide. The Applicant explained how this spreadsheet summarised the following points:

- a. Analysis of Trends over the Covid-19 Pandemic
- b. Update on Future Models
- c. Assessment of Risks

- 4.1.2 The Applicant confirmed that it is on track in the areas that they need to be on transport modelling. The Applicant is in the process of looking at the impact of future models following the guidance of the DfT. However, engagement is still required with the relevant Highway Authorities. The Applicant reassured the ExA that it is happy with the initial findings of Transport Modelling, but that there is still more work to do.
- 4.1.3 The Applicant has seen 'recovery' in trip rates since the pandemic, but the changes are still evolving. Whilst there has been some recovery on the strategic road network, the local road network trends are below the rates seen pre-pandemic. The Applicant concluded on this point that there is still further work to do as there is a possibility of slightly reduced traffic flows being input into the models. The findings of the Future Model will be reflected in the Applicant's submission at the relevant deadline and that assessment undertaken will be presented as a reasonable worst case.
- 4.1.4 The ExA commented that the update provided by the Applicant was good news and asked if the Applicant has had any discussions with the stakeholders. The Applicant responded that the next stage is to make decisions about how the Applicant should reflect what the stakeholders want in the Transport Modelling that is due to take place. The ExA requested if this was something that could be submitted in examination. The Applicant explained that at this point in the modelling programme it was not possible to do so and the ExA responded that they would appreciate any further update that could be provided during the examination period. The Applicant reassured the ExA that the Transport Modelling is on track based on the initial findings.
- 4.1.5 The ExA confirmed that Task 19 in relation to Traffic Data and the Environmental Assessment will be covered during the next round of hearings that are scheduled to commence in the week beginning 27 November 2023.
- 4.1.6 The ExA asked the other Interested Parties (IPs) if they had any comments for the Applicant. Buckinghamshire Council (BC) conveyed that they had concerns with Paragraphs 2.21-2.22 of the **Applicant's response to Written Representations – Part 2 Interested Parties subject to a Statement of Common Ground [REP2-035]**, but the Applicant was engaging with them on this matter.
- 4.1.7 The Applicant confirmed to the ExA that they have already responded to various questions on the adequacy of Transport Modelling with BC. The ExA acknowledged this and raised an action point for the Applicant to provide a written copy of the oral summary to be provided on the ongoing work

undertaken to update the transport modelling in line with the DfT guidance. The Applicant agreed to this and will also submit Technical Notes 1 and 2 in relation to the ongoing work that has been undertaken to update the transport modelling at the relevant deadline.

4.1.8 John Smith, Harpenden resident (JS), queried what surveys had been carried out in Harpenden to support the modelling work. The Applicant acknowledged that it would respond in writing once the IP's concerns were submitted at D3.

4.1.9 National Highways (NH) confirmed that it is supportive of the Applicant's plans but requested further clarity on the Applicant's updated approach to M1. The Applicant confirmed that the "all lanes running scenario" will be removed from the model.

4.2 Forecast Infrastructure Assumptions

4.2.1 The ExA then referred to Agenda Item 3.2 and how the certainty of delivery by the East West Rail Scheme had been assumed in the updated modelling. The ExA asked the Applicant to confirm if the East West Rail Scheme being included in the transport modelling as 'near certain' was appropriate. The Applicant replied that the phasing of the East West Rail Scheme has been changing over the years. When the Applicant undertook the modelling phasing of the Bicester to Bedford section of the programme, East West Rail was due to be delivered earlier. The Applicant confirmed that the phasing of East West Rail does not have a material impact on the results of the transport modelling.

4.2.2 The ExA queried the M1-A6 Link, referring to the **Transport Assessment [APP-203, AS-123, APP-205 and APP-206]** and the **Trip Distribution Plans [REP1-019]**, where the trip distribution plans did not show traffic using this link. The Applicant confirmed that the trip distribution plans only showed daily traffic as opposed to traffic at different times of the day. The ExA requested that the Applicant provides a simplified version of the information in the Transport Assessment by Deadline 4 (D4). The ExA's suggestion was to potentially revise the trip distribution plans, which show the traffic flows for each of the assessment phases, with both the Proposed Development and without it. The Applicant noted the ExA's request for this to be actioned in a simplified way and to also include the M1-A6 link so that this can easily be explained to the Secretary of State.

4.2.3 In response to submissions made by Local Authorities (LAs), the ExA also requested that the Applicant provides improved background to the **Trip Distribution Plans [REP1-019]** so that the individual roads can be easily identified, as well as extracts to show traffic on the B489 link by the relevant deadline.

Post-hearing Note: the Applicant is in the process of updating the map background on the trip distribution plans and these will be completed for D4.

4.2.4 In response to the submission made by JS and the ExA's request in respect of traffic surveys, the Applicant clarified that there are two levels of data and that the traffic surveys are being updated to reflect any changes. The Applicant has also been undertaking further data collection to better understand mode share.

- 4.2.5 The Applicant further explained how long-term trends on traffic flows have changed. The data set is rich on the network, but there are several sites and locations where the data set is limited. The ExA asked if the Applicant has any transport data from the LAs and the Applicant confirmed that as part of the process, the Applicant has worked with the LAs and gathered data where that data is available.

5 AGENDA ITEM 4 - OFF SITE HIGHWAY WORKS

5.1 Proposed Highway Works to three junctions in Hitchin

- 5.1.1 The ExA made a general observation that there was no evidence of safety audits, which was also raised in the Compulsory Acquisition Hearing and requested that the Applicant explains its reason for not undergoing stage one safety audits. The Applicant confirmed that stage 1 road safety audits have been commissioned and that the Applicant will aim to have these available for the next set of hearings, the results of which it acknowledges the ExA would expect to discuss. The ExA highlighted the tight timeline given any need to amend compulsory land acquisition and so the sooner the ExA receive these results, the better. The Applicant acknowledged both the ExA's requests on this point and confirmed that it would be happy to provide ongoing updates on whether additional land would be required, subject to the compulsory acquisition.
- 5.1.2 NH noted that the Applicant had indicated that the road safety audits had been commissioned on the local road network and sought clarification on the strategic road network. The Applicant confirmed that road safety audits on Junction 10 had not been commissioned yet due to the on-going discussion with NH on the details of the works to Junction 10, but that the Applicant will be discussing this with NH's team shortly.
- 5.1.3 The ExA then moved on to the off-site works and invited the Applicant to comment on the three junctions in Hitchin shown in the **Offsite Highways Works Plans [AS-023]** and how the Applicant has addressed these proposals. The Applicant noted that all three junctions are roundabouts and that the works that the Applicant is proposing are relatively minor given the constraints of the network. The Applicant noted that the proposals are consistent with the measures, in particular at Corridor 6, Luton to Stevenage, which seeks to improve passenger transport connectivity between Luton and Stevenage, including consideration for highway improvements and improving access to the Airport. The Applicant acknowledged that the proposals did not directly provide any walking or cycling improvements but did not preclude these either, noting that the proposals had sought to provide additional capacity given the land constraints around the junctions. The ExA noted that the Applicant could compulsorily acquire additional land at this stage for works. The Applicant stated that the **Transport Assessment** chapters 10 to 14 [**APP-205 to APP-206**] sets out the impacts of the Proposed Development, and the proposed measures were considered proportionate given the impact at these locations and given the land constraints around the junctions.

5.1.4 The ExA requested that the Applicant produces a simplified table for each junction of the proposed off-site highway works, detailing the queue lengths, delay, and ratio flow to capacity for three scenarios:

1. without the Proposed Development,
2. with the Proposed Development (and no junction improvements); and
3. with the Proposed Development and the proposed highway improvements.

The ExA requested that the Applicant complete this by D3 originally for each of the assessment phases. However, the Applicant explained that scenario 2 was not available so it would not be possible to summarise the information in the way that the ExA originally requested, but that summary information can be provided to the examination at the relevant deadline. The ExA queried how the Applicant knows the impact of mitigation and their effect. The Applicant stated that the without Proposed Development scenario provided a picture of a future baseline performance and the with the Proposed Development scenario was the benchmark to which mitigation had been developed. The Applicant has looked at the future base line and worked to mitigate the Proposed Development back to this level.

5.1.5 NH requested that the ExA ask the Applicant for assurance on the additional funding for these proposed highway works given that they were low cost; did not address walking and cycling requirements; and if the designs were to be amended that would also need to be funded. The Applicant responded to NH's concerns by conveying the benefits of the improvements from these proposed works that the works did not preclude other improvements should proposals come forward. The ExA noted that walking and cycling would be discussed further later.

5.1.6 NH expressed their concerns around the baseline assessments (**Transport Assessment [APP-203, AS-123, APP-205 and APP-206]**) not setting out the distinction between growth and development to enable a full assessment of the improvements at this point in the examination. NH expressed their view regarding commitment from the Applicant to several measures including signage and maintenance bays and requested for this commitment to be made by the Applicant.

5.2 Proposed Highway Works to Crawley Green Road and Wigmore Lane

- 5.2.1 The ExA queried the proposed highways to Crawley Green Road and Wigmore Lane, which led to the following action point for the Applicant by D3:
- a. Confirm whether the zebra crossing to Queen Elizabeth School was included in the assessment of the proposed signalised junction at Lalleford Road and Crawley Green Road. If not, why not and should it be?
 - b. Confirm what widths will remain after the widening on Crawley Green Road and Wigmore Lane to provide safe and appropriate access for non-motorised users.

- c. Confirm what is proposed for cycle route J.

5.3 Proposed Highway Works to Eaton Green Road

- 5.3.1 The ExA requested tables similar to those for the Hitchin junctions, which the Applicant will provide at the relevant deadline.

5.4 Proposed Highway Works to London Road South Roundabout

- 5.4.1 In response to the query of Central Bedfordshire Council (CBC) on the issue of detailed design and phasing of delivery, the Applicant confirmed that discussions are on-going and that the Road Safety Audits have been commissioned.
- 5.4.2 NH expressed their concerns on Junction 10 as microsimulation shows the junction is over capacity, so the impacts are difficult to ascertain. The Applicant helpfully did more detailed modelling. NH remained concerned that there are some residual impacts on the south facing slip roads and confirmed that NH had undertaken some further work, which showed proposals for slip road works that can be shared at D3. The Applicant confirmed that the Applicant continues discussions with NH on the point.

6 AGENDA ITEM 5 - PARKING

6.1 Fly-Parking

- 6.1.1 The ExA conveyed that fly-parking is a concern to those living around Luton. The Applicant explained that fly-parking applies to airport passengers. The Applicant confirmed that fly-parking has been considered in a partnership approach. For example, the Applicant is working with Luton Borough Council (LBC) for deliverable options, focusing on the **Framework Travel Plan [AS-131]**. The questions for the Applicant surrounding fly-parking led to the following action points to be completed by the deadlines set by the ExA:
 - a. Provide an update and details of the on-going discussions regarding how the Applicant and LBC are working together to resolve the issue of fly parking by D4.
 - b. Confirm looking at the issue of fly-parking and how this is going to be addressed. This is an ongoing action, but the update is to be provided by Deadline 5 (D5).
- 6.1.2 The ExA also asked the Applicant if they were aware of the websites being used for the purposes of local residents in Luton offering their own driveways to rent by airport passengers. The Applicant confirmed the Applicant's awareness of the websites, but raised the point that these websites are not unique to Luton. The ExA mentioned the website for Stansted Airport, which does not raise the same issues as the concern being expressed for Luton are in relation to fly-parking being encouraged instead of staff parking. The Applicant noted in its response that staff can travel for free on the DART.

6.1.3 The ExA referred to Figures 8.8, 8.9 and 8.10 of the **Transport Assessment [AS-123]** and asked the Applicant if they had considered the risk of fly-parking. The Applicant confirmed that the risks of fly-parking are being looked at as part of the wider surface access strategy and conveyed that the Applicant recognises the unique nature of the airport in this regard and conveyed to the ExA that it will engage with the stakeholders on these issues. The ExA specifically asked LBC for their comment on this.

6.1.4 JS remarked that there was no mention of Harpenden in relation to fly-parking despite being as affected as LBC. The ExA confirmed that the Applicant will take this into consideration. Tim North on behalf of Holiday Extras Limited (TN) raised that there has been no meeting with the Applicant in terms of fly-parking and that the cost of parking needs to be discussed to solve the issues surrounding fly-parking. TN will submit his comments on fly-parking and off-site parking and the Applicant will respond at the relevant deadline. The ExA replied that the Applicant will explain how they included off-site parking in terms of assessment.

6.2 On -Site Parking

6.2.1 The ExA had no further questions on this agenda item and asked the IPs if they had any comments on this, but the concerns were only with respect to fly-parking.

7 AGENDA ITEM 6 - MONITORING

7.1.1 The ExA understood from the response to the relevant representations of NH that the Transport Related Impact Monitoring and Mitigation Approach (TRIMMA) is under consideration and will contain detail about how airport related traffic will be monitored and reported on as well as the governance associated with the delivery of mitigation measures. The ExA asked the Applicant to provide an update on the progress of the development of the TRIMMA, including how airport related traffic on the local highway will be monitored and when this report will be submitted to the ExA.

7.1.2 The Applicant explained the TRIMMA approach is set out as an outline on Page 202 of **Appendix I** of the Transport Assessment **[APP-202]** and that since that was submitted, the Applicant has had several engagement sessions with the local highway authorities and NH to take them through the evolution of the TRIMMA approach. These ongoing engagement sessions have principally set out how the Applicant will undertake monitoring of airport related trips and will have an updated understanding of the wider highway network. The Applicant has received feedback from those highway authorities that the Applicant will seek to build into the TRIMMA document. The Applicant confirmed that it will submit the TRIMMA to the examination at the relevant deadline.

7.1.3 The ExA asked a further question on the TRIMMA in relation the Hertfordshire Authorities' concerns that aside from the Hitchin Junctions, no other roads or junctions in Hertfordshire are included. The ExA asked the Applicant to confirm

whether they are in discussion with the Hertfordshire Authorities on this and if these discussions are ongoing, whether this issue will be resolved before the close of the examination. The Applicant confirmed that the discussions are ongoing and that these are the junctions that require mitigation as identified in the **Transport Assessment [APP-203, AS-123, APP-205, APP-206]**. The opportunity to introduce other locations through the TRIMMA will be part of the discussions by the Airport Transport Forum (ATF) and a steering group will be set up to effectivity introduce and manage the TRIMMA.

- 7.1.4 In response to LBC, The Applicant confirmed that the ATF Steering Group's Terms of Reference are being developed and will be shared with the host authorities for their agreement prior to the Terms of Reference being incorporated into the DCO. The Applicant will share the Terms of Reference with the LAs by the relevant deadline.
- 7.1.5 In response to the concerns raised by BC, the Applicant confirmed that it has mitigated all the known effects and those are part of the costs that have been identified for the project already. Moreover, the Applicant clarified that BC's suggestion that there might be known effects that have not been mitigated against is not the case in relation to the unexpected unintended consequences aspect of the TRIMMA.
- 7.1.6 The Applicant responded to BC with respect to ATF Membership and requested that they write to the Airport Operator to request membership of the ATF. The Airport Operator of the ATF will consider this request. In relation to mitigation type to the residual impacts, the Applicant explained that the impacts by their very nature have not yet been identified through the assessment. Therefore, these impacts will be brought to the ATF steering group by members and studies will be undertaken to determine whether they are impacts that are indeed because of the airport growth. The Highway Authorities will be able to do that through the ATF and the ATF steering group. The size of any fund which could contribute to delivery of such work is still being considered by the Applicant.
- 7.1.7 The ExA invited other IPs to comment on the ATF, ATF Steering Group and TRIMMA. The Applicant will consider the requests made by BC, England's Economic Heartland and NH in respect of ATF membership by the relevant deadline.

8 AGENDA ITEM 7 - SUSTAINABLE TRANSPORT

8.1 Determination of future rail capacity

- 8.1.1 The ExA commented on how the Aviation Policy Framework states that all proposals for airport development should demonstrate how the airport will increase the use of public transport by passengers to access the airport. In relation to rail access to Luton Airport, the representation responses raised a concern over the capacity of the rail network. The ExA asked the Applicant to explain how the future rail capacity was determined and provide details on the

discussions that the Applicant has had to date with rail operators in relation to this concern.

- 8.1.2 The Applicant provided assurance to the ExA that the policy requirements around sustainable transport are reflected in the various documents that it has produced including the **Surface Access Strategy [APP-228]**, the **Framework Travel Plan [AS-131]** and the details of the Sustainable Transport Scheme itself. This has already been evidenced in the investments that have been made by the Applicant and the transformative effect that these investments are going to have on how people access the airport by public transport, on the specifics of rail and rail capacity. London Luton Airport is well served by rail through a number of services calling at Luton Airport Parkway and that level of service has recently improved dramatically through service enhancements, train lengthening, and the introduction of new services like the East Midlands Express Service from London St Pancras that is running at the moment.
- 8.1.3 The connections from the Airport Terminal to the Luton Airport Parkway Station have also been strengthened by the DART. The Applicant explained that the quality of the whole passenger experience and the ease of interchange between National Rail and the DART through the station itself is extremely high. A combination of those measures gives Luton a high degree of rail accessibility on that North South corridor. The work that the Applicant has done through the **Transport Assessment [APP-203, AS-123, APP-205 and APP-206]** and **Chapter 18** of the Environmental Statement (ES) **[AS-030]** looks at the rail capacity of that line based on the existing levels of service and the capacity that is available as well as the distribution of airport related demand. Whilst the Applicant is forecasting an increase in rail demand overall, the increase in demand poses no problems at all for the services. The detail contained in Inset 18.8 and Inset 18.9 in **Chapter 18** of the ES **[AS-030]** provides an assessment of the additional passengers per train and identifies the relatively known low numbers of additional users per train that would take place.
- 8.1.4 The Applicant also pointed out that the peak periods or background rail demand, which is typically dominated by commuting in this area into London and out of London is quite different to the peak periods for people traveling to the airport and from the airport by rail. The Applicant has looked at the potential for overlaps and where that might create problems. The Applicant's position is that there is sufficient rail capacity on the line and in the station to deal with the future demand. In the short term, the rail network is served by existing operators who are operating under defined periods. The Applicant's long-term strategy looks beyond that. The Applicant flagged to the ExA the importance of aligning the long-term vision for the railways in the UK and confirmed that the Applicant is engaged both at the operator level, but also looking at long term capacity improvements on the line. The Applicant emphasised that the overriding message from the work done is that Luton is well connected by rail. The rail capacity has significantly improved over recent years and there is a significant amount of capacity that the Applicant can use without posing any negative impacts on the network at all. The ExA confirmed to the Applicant that this answer was "really useful" and asked the Applicant to provide a written copy of this response made on rail capacity by Deadline 3.

- 8.1.5 The ExA then asked Network Rail a question concerning rail capacity issues. The response from Network Rail led to an action point by Deadline 5 for Network Rail to provide an Assessment as to whether the increased passengers numbers will create any rail capacity issues (as noted in Network Rail's **Written Representations [REP1-113]**).
- 8.1.6 The Applicant provided reassurance to Network Rail in relation to these concerns by confirming that Luton Airport Parkway Station has been upgraded relatively recently to provide capacity for future growth. The Applicant confirmed that through their work in accordance with the **Transport Assessment [APP-203, AS-123, APP-205 and APP-206]**, the Applicant has looked at the additional rail demand in the context of the Airport station design, background flows, given that most people using that station are airport related; and scoped out the need to do any further assessment on capacity.
- 8.1.7 The Applicant made it clear to the ExA that the station has abundant capacity to deal with future demands, both in terms of concourses, gait lines, vertical circulation, and platforms. The Applicant offered to provide the ExA a commentary on that and the ExA agreed that this would be helpful. The Applicant agreed to provide commentary on the physical capacity of the station at the relevant deadline.

8.2 Impact and usage of the DART

- 8.2.1 The ExA asked the Applicant questions about the DART Service that were answered positively. The Applicant confirmed how successful the DART Service has been since its launch. This response led to the ExA proposing the following action points by Deadline 3 for the Applicant:
- a. Provide information on the comparative cost of the previous bus service and the new DART service.
 - b. Submission of oral update provided on the DART service.

8.3 Details on the discussions the Applicant has had with bus and coach operators

- 8.3.1 The ExA commented on how there were several relevant representations that raise the concern about the lack of bus and coach routes. On this basis, the ExA asked the Applicant to provide a summary of their discussions with bus and coach operators. The ExA also questioned the Applicant's confidence that the new spaces for buses and coaches provided at Luton Airport will be utilised by the bus and coach operators. The discussion on this led to the following action points by Deadline 3 for the Applicant:
- a. If possible, provide an updated figure for the number (and percentage) of staff who are currently travelling by bus.
 - b. Provide a written copy of the oral summary provided on staff bus usage.
 - c. Provide an update with regards to bus route 61.

8.3.2 In relation the concerns raised by the IPs on the Sustainable Transport Fund, the Applicant explained to the ExA that it cannot confirm what the amount of the Sustainable Transport Fund will be as it is subject to ongoing discussions. The Applicant stressed that the principle of the sustainable transport fund is a sound one, but how it works in practice will be subject to live discussions. The ExA requested the Applicant to provide an update on the Sustainable Transport Fund including indicative costs and how it would be secured. The Applicant will provide this to the ExA by the relevant deadline.

8.4 Cycling and Walking

The ExA commented that the National Planning Policy Framework states that transport issues should be considered from the earliest stages of plan making and development proposals. Consequently, the opportunities to promote walking, cycling and public transport use are identified and pursued. The ExA asked the Applicant to explain the physical measures that are included within the Proposed Development that promote cycling and walking. Discussions between the Applicant and the IPs on this led to the following action points for the Applicant:

- a. By the relevant deadline, clarify that the Airport Access Road is to include segregated shared pedestrian/cycle facilities and provide relevant details by the relevant deadline.
- b. By the relevant deadline, provide an assessment of the catchment area where staff live and whether walking/ cycling would be an option and if so, how could this be maximised.

9 AGENDA ITEM 8 - FRAMEWORK TRAVEL PLAN

9.1.1 The ExA flagged that the **Framework Travel Plan [AS-131]** has already been referred to during ISH4, but that there were several representations that raised concerns that there were no actual confirmed interventions or measures in the toolbox, and they do not have any confidence that the items will be implemented. CBC's **Written Representations [REP1-046]** raised the concern that there was no mechanism for the prioritisation of investment between geographical areas, modes of transport or intervention. CBC was also concerned that the use of terms such as explore and consider will carry little planning weight, as they provide no measurable commitment to implement or fund.

9.1.2 The ExA asked the Applicant to give a brief overview as to how the toolbox approach will work in practice. The following will be addressed by the relevant deadline by the Applicant:

- a. Update the toolbox of intervention and measures to include an additional column which identifies the indicative timescales/ restrictions for implementation of the measures.
- b. Identify which of the toolbox interventions and measures are now proposed to be implemented as part of the application.

10 AGENDA ITEM 9 GREEN CONTROLLED GROWTH - SURFACE ACCESS MODE SHARE

- 10.1.1 The ExA raised the concern from relevant representations that Surface Access Mode Share targets were too low. The ExA asked the Applicant to provide a summary of the work done to determine the proposed mode shares for surface access. The Applicant confirmed it is very aware of the existing baseline conditions and the changes that London Luton Airport has experienced throughout the Covid-19 Pandemic. The outcome around the passenger mode share by public transport had been an improving one and then radically adjusted in response to the pandemic when people moved away from public transport, and then travelled more by private car.
- 10.1.2 The Applicant confirmed that London Luton Airport is still not back to pre-pandemic levels of public transport mode share. The ExA asked further questions on the specific statistics concerning surface access mode share. The Applicant emphasised the link of Green Controlled Growth (GCG) to transport and confirmed that the Applicant believes it has an ambitious approach to achieve GCG for London Luton Airport and the intention of GCG is to try to ensure that the airport is operating within the agreed environmental limits. The ExA invited IPs to comment on GCG in relation to transport only and the Applicant answered specific questions in relation to where limits can be found in the **Environmental Impact Assessment Scoping Opinion Response [APP-047]**.

11 AGENDA ITEM 10 - ACTION POINTS ARISING FROM THE HEARING

- 11.1.1 Response to the Action Points set out in Table 1.1 below.

12 AGENDA ITEM 11 - ANY OTHER BUSINESS

- 12.1.1 The Applicant did not make any submissions under this Agenda Item.

13 AGENDA ITEM 12 - CLOSE OF HEARING

- 13.1.1 The Applicant did not make any submissions under this Agenda Item.

Table 1.1: Applicant's Responses to Action Points from ISH4

Action	Description	When	Applicant's response
1	Provide a written copy of the oral summary provided on the ongoing work undertaken to update the transport modelling in line with Department for Transport guidance.	D3	<p>The work on accounting for COVID-19 in transport modelling (in response to the ExA's Rule 9 Procedural Decision letter, dated 13 June 2023) is progressing according to the methodology and programme set out in the Applicant's response, 27 June 2023 [AS-064].</p> <p>Traffic data have been collated and analysed for the 2016 to 2023 period for the strategic road network (SRN) and local road network (LRN), where available. The SRN data (for the M1 Junctions 8 to 12 and M25 either side of the M1) have been obtained from National Highways' WebTRIS database and the LRN data have been obtained from local highway authorities.</p> <p>The key findings are:</p> <ul style="list-style-type: none"> • SRN flows – M1 and M25 mainline largely 'recovered' with peak hour and daily flows above 2019 (and also above 2016 base year); • SRN flow exception – A1081 between J10 and J10A not quite fully 'recovered'; • LRN – data show volumes have not 'recovered' with flows lower than 2019 (pre-COVID-19) and lower than 2016 (base model year); and • Trends analysis conclusion – SRN largely 'recovered', LRN not fully 'recovered' and there may therefore be a case for post-model slight downward adjustment to traffic forecasts. <p>The strategic model is currently being updated to take account of latest future year land use and transport infrastructure assumptions and DfT growth projections. In doing so, the uncertainty log (for development and infrastructure) has been updated and circulated to stakeholders and latest growth rates from the National Trip End Model</p>

Action	Description	When	Applicant's response
			<p>version 8 (NTEM8) and Nation Road Traffic Projections 22 (NRTP22) have been incorporated into the model.</p> <p>Analysis of NTEM8/NRTP22 growth (prior to model runs) indicates the possibility of slightly reduced traffic flows when compared with flows within DCO documents (based on the previous NTEM version 7.2 and Road Traffic Forecasts 2018 growth, which preceded NRTP22). This will be confirmed after processing the updates via the demand model and highway assignment model.</p> <p>The demand model and highway and public transport assignment models are currently being run and checked for the 2027, 2039 and 2043 future years, plus the additional 2023 year, for comparison with count data.</p> <p>The initial conclusions are:</p> <ul style="list-style-type: none"> • the updated forecasts may end up being slightly lower than in the DCO documents • there may be a case for subsequent slight downward adjustment to the forecasts based on the trends analysis, although noting the limitations on the available data (i.e. six sites on the LRN, after screening and selection); • an initial risk assessment indicates this to be 'low' - due to the possible slightly reduced traffic flows, plus potential further downward adjustment, and therefore the mitigation measures can be considered as 'robust' and the Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) will trigger measures on a 'need/impact' basis; and • this raises the question on whether 'Task 16: Produce adjusted Future Year road and rail forecasts (if required and subject to TN2)' will be needed, which will be discussed and confirmed, following completion of the updated model runs, at next round of engagement.

Action	Description	When	Applicant's response
			<p>The Applicant has met twice with the National Highways and local highway authority (LHA) stakeholders:</p> <ul style="list-style-type: none"> • in July to discuss the approach and timescales; and • in September to discuss the trends analysis and to provide an update on the modelling and initial risk assessment. <p>A further meeting will be arranged in October to discuss the differences between the updated model runs and the previous runs (as reported in the DCO documents), the trends analysis and 2023 forecast and observed comparison, the risk assessment and the need (if any) for post model adjustments.</p> <p>The work is currently on-track for reporting to the ExA in December 2023 as set out in the Applicant's letter of 27 June 2023 [AS-064].</p>
2	Submit Technical Notes 1 (TN1) and 2 (TN2) in relation to the ongoing work undertaken to update the transport modelling in line with Department for Transport guidance.	D4 for TN1 TN2 submit when ready.	The Applicant noted this action and will address at the relevant deadline.
3	Submit concerns regarding the modelling with the Applicant to provide a response at the following deadline. (NB this action is for the Interested Party and not the Applicant)	D3	Applicant to provide a response at D4 to the point confirmed by the Interested Party at D3
4	Provide a simplified version of the information in the Transport Assessment (potentially by revising the trip distribution	D4	The Applicant noted this action and will address at the relevant deadline.

Action	Description	When	Applicant's response
	plans) which shows the traffic flows for each of the assessment phases (with the Proposed Development and without) in a simplified way. This should also include the M1-A6 link.		
5	Provide improved background to the Trip Distribution Plans [REP1-109] so that the individual roads can be seen clearly.	D4	The Applicant noted this action and will address at the relevant deadline.
6	Provide extracts to show traffic on the B489 link.	D4	The Applicant noted this action and will address at the relevant deadline.
7	Provide on-going updates regarding progress of the road safety audits, including for the strategic road network (SRN) and in particular whether they would require additional land to be compulsory acquired.	D5	The Applicant noted this action and will address at the relevant deadline.
8	For each junction of the proposed off-site highways works produce a simplified table which provides a summary detailing the queue lengths, delay and ratio flow to capacity for three scenarios of; 1. without Proposed Development, 2. with	D4	The Applicant noted this action and will address at the relevant deadline.

Action	Description	When	Applicant's response
	Proposed Development (and no junction improvements) 3. and then with Proposed Development and the proposed highway improvements. This will need to be done for each of the assessment phases.		
10	Confirm whether the zebra crossing to Queen Elizabeth School was included in the assessment of the proposed signalised junction at Lalleford Road and Crawley Green Road. If not, why not and should it be?	D3	<p>The operation of the proposed signalised junction at Lalleford Road and Crawley Green Road was assessed using the Luton DCO VISSIM model.</p> <p>The zebra crossing to Queen Elizabeth School was not explicitly included within the Luton DCO VISSIM model given that the crossing is located over 60m from the location of the Lalleford Road/Crawley Green Road junction and in general was not considered to interact with the crossing. Whilst not explicitly modelled, the influence of the crossing would be accounted for in the base model validation which considers journey times and junction operation.</p> <p>Further information on the approach is provided below.</p> <p>The zebra crossing on Crawley Green Road connects the residential areas to the south with the Queen Elizabeth School to the north. The main demand for the crossing would therefore occur between 8am and 8:30am when the school opens, and at the end of the school day at 3pm. Outside these times, demand would likely be low which means the PM peak modelling would be unaffected.</p> <p>The zebra crossing is located approximately 65m west of the give way line at the existing Crawley Green Road/Lalleford Road mini roundabout. This distance would accommodate a queue of circa 11 vehicles, assuming 6m per vehicle.</p>

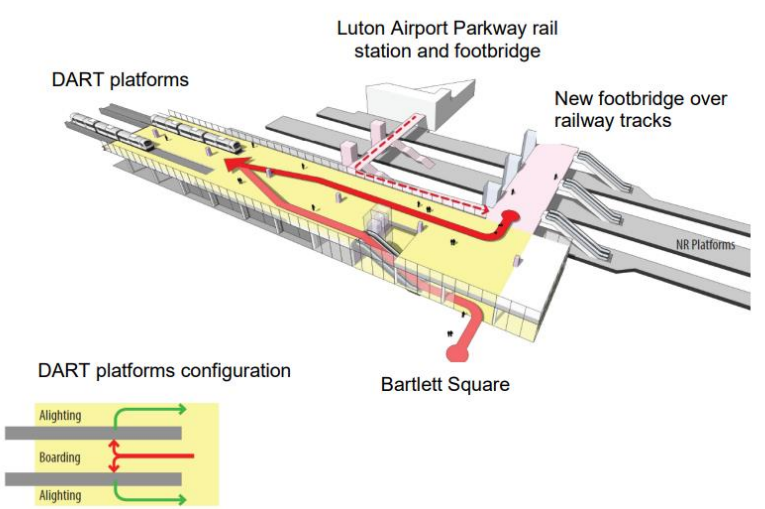
Action	Description	When	Applicant's response
			<p>Traffic movements along Crawley Green Road and Lalleford Road were validated on the basis of the turning movements at junctions along the corridor. The validation of the model turning movements against the survey data for the Crawley Green Road/Lalleford Road junction- as well as upstream and downstream junctions, including the Crawley Green Road junctions with Ashcroft Road and Wigmore Lane and the Lalleford Road/Eaton Green Road junction- indicates that the journey time along the corridors was representative of the observed AM and PM peak conditions.</p> <p>As part of the Proposed Development, the Crawley Green Road/ Lalleford Road junction would be upgraded to a signalised junction which would slightly reduce the distance between the junction stop line and the zebra crossing to circa 61m. This means that there was space for circa 10 vehicles to queue at the stop line.</p> <p>Traffic modelling in Table 10.131 of the Transport Assessment [APP-205] shows that the average modelled queues in the 2043 full development network peak hours are well within the available storage space between the junction and crossing. Whilst the maximum queues do extend back to the crossing, these are intermittent and do not affect the overall operation of the crossing or conversely the junction.</p> <p>It is also noted that the junction improvement incorporates a new pedestrian crossing on the eastern arm of Crawley Green Road, which potentially serves some crossing movements that might otherwise have occurred at the zebra crossing.</p>

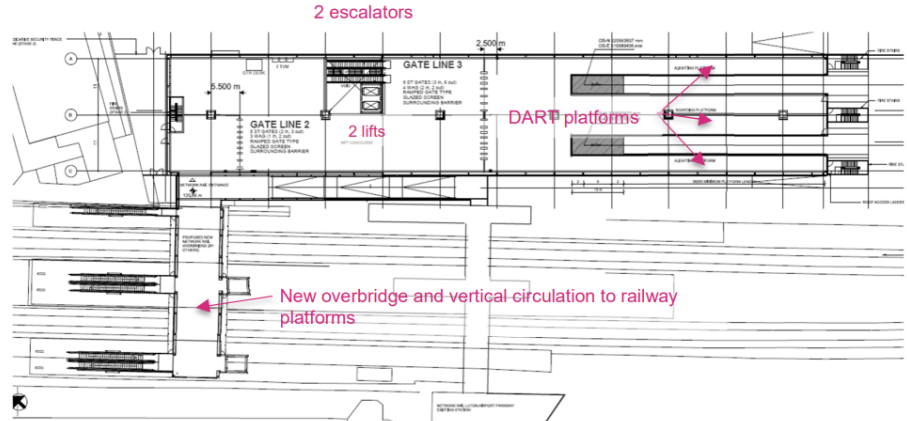
Action	Description	When	Applicant's response
11	Confirm what widths will remain after the widening on Crawley Green Road and Wigmore Lane to provide safe and appropriate access for non-motorised users.	D4	The Applicant noted this action and will address at the relevant deadline.
12	Confirm what is proposed for cycle route J.	D3	The highway improvements proposed as part of the airport expansion include measures that would be complimentary to cycle route J including an off road shared pedestrian/cycle path on the Airport Access Road and Eaton Green Road Link, an improved environment (reduced traffic) for cycling on Percival Way and potentially the western end of Eaton Green Road, controlled crossings and the potential to provide for advanced cycle stop lines at the new signal controlled junctions on Crawley Green Road, Wigmore Lane, Eaton Green Road, Frank Lester Way and Airport Way.
13	Provide an update and details of the on-going discussions regarding how the Applicant and Luton Borough Council are working together to resolve the issue of fly parking.	D4 (confirmed at D3)	<p>The Applicant, the Operator, Luton Borough Council (LBC) and other host authorities attend the quarterly London Luton Airport Consultative Committee (LLACC), at which the topic of fly-parking is frequently discussed.</p> <p>In 2017, the Applicant held discussions with LBC about the introduction of controlled parking zones (CPZ) in the Wigmore and Vauxhall Park areas of Luton. LBC consulted on these and, in response to that consultation implemented a resident's parking zone in part of the Vauxhall Park area.</p> <p>The Applicant will continue to discuss this topic with LBC, including in the context of an area-wide parking strategy which the Applicant understands is being considered by LBC.</p>

Action	Description	When	Applicant's response
			The Applicant will also seek to mitigate the effect of any airport-related fly-parking, through collaboration and agreement with LBC. Discussions regarding the mechanisms for this, which is likely to be linked to travel plan measures and the TRIMMA, are ongoing. The Applicant is equally prepared to discuss with other highway authorities what it can do to assist where airport related fly-parking becomes a significant nuisance in other areas.
14	Confirm looking at the issue of fly-parking and how this is going to be addressed.	Ongoing but update to be provided by D5.	The Applicant noted this action and will address at the relevant deadline.
15	Mr North of Holidays Extras Ltd to submit his comments on fly-parking and off-site parking and the Applicant to respond at the following deadline.	D3/D4	The Applicant noted this action and will address comments raised by Mr North at D3 in writing at D4.
16	Submission of Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA).	D4	The Applicant noted this action and will address at the relevant deadline.
17	Terms of reference (TOR) for the Airport Transport Forum (ATF) to be shared with the local authorities.	D4	The Applicant noted this action and will address at the relevant deadline.
18	Consideration of request by Buckinghamshire Council, England's Economic Heartland and National Highways to be members of the ATF.	D4	The Applicant noted this action and will address at the relevant deadline.

Action	Description	When	Applicant's response
19	Provide a written copy of the oral update provided on rail capacity.	D3	<p>The rail study contained in the Chapter 11 of the Transport Assessment [APP-206] primarily focused on overall rail capacity on the lines between London Luton Airport Parkway and St Pancras, the section with where London Luton Airport demand is greatest and is shared with significant commuter and other passenger demand.</p> <p>The study looked at the projected airport and non-airport demand compared to relevant capacity on the network allowing for 3% annual growth in non-airport passengers from 2019. Given the reduction in demand since covid this represents a worst-case scenario that is unlikely to be achieved. Even with the worst-case scenario there remained spare capacity on the railway to accommodate railway passengers in all the airport scenarios. London Luton Airport expansion passengers represent a small share of the total demand (<10%).</p> <p>Outside Luton Airport Parkway station, the wide distribution of airport passengers and multiple interchange options means demand will be distributed amongst stations along the route therefore individual station assessments would not be necessary due to the small flows involved compared to background flows.</p> <p>There have also been changes to the timetable and patterns of demand with the new Luton Airport Express and DART operating, combined with the recovery from Covid for both the airport and wider economy means assessing changes to patterns has not been possible without a lengthy period of post pandemic demand to analyse.</p>

Action	Description	When	Applicant's response																														
21	Provide a commentary on the physical capacity of Luton Parkway Station.	D3	<p>Luton Airport Parkway Station capacity was assessed as part of the project to develop DART at the station. Two key documents.</p> <ul style="list-style-type: none"> • DART Demand Basis of Design Report (24/03/2020) • NR Parkway Station & DART Stations Capacity Report (26/03/2020) <p>The basis of design report sets out the design capacity that Luton Dart would be designed to accommodate. It used 3 scenarios – 25 mppa, 23 mppa and 38 mppa with the following demands per hour.</p> <p style="text-align: center;">Table 2.1: Demand Projections to 38mppa (York Aviation)</p> <table border="1" data-bbox="1032 632 1785 868"> <thead> <tr> <th data-bbox="1032 632 1272 691">Annual Passengers Date</th> <th colspan="2" data-bbox="1272 632 1469 691">25 mppa 2029</th> <th colspan="2" data-bbox="1469 632 1666 691">32 mppa 2039</th> <th data-bbox="1666 632 1785 691">38 mppa (test)</th> </tr> <tr> <th></th> <th data-bbox="1272 691 1384 754">Typical Day</th> <th data-bbox="1384 691 1469 754">Peak Day</th> <th data-bbox="1469 691 1581 754">Typical Day</th> <th data-bbox="1581 691 1666 754">Peak Day</th> <th data-bbox="1666 691 1785 754">Peak Day</th> </tr> </thead> <tbody> <tr> <td data-bbox="1032 754 1272 791">2 way Busy Hour</td> <td data-bbox="1272 754 1384 791">6,874</td> <td data-bbox="1384 754 1469 791">7,042</td> <td data-bbox="1469 754 1581 791">8,864</td> <td data-bbox="1581 754 1666 791">9,744</td> <td data-bbox="1666 754 1785 791">10,037</td> </tr> <tr> <td data-bbox="1032 791 1272 828">Arrival Busy Hour</td> <td data-bbox="1272 791 1384 828">3,626</td> <td data-bbox="1384 791 1469 828">3,794</td> <td data-bbox="1469 791 1581 828">4,510</td> <td data-bbox="1581 791 1666 828">4,924</td> <td data-bbox="1666 791 1785 828">5,230</td> </tr> <tr> <td data-bbox="1032 828 1272 868">Departure Busy Hour</td> <td data-bbox="1272 828 1384 868">4,354</td> <td data-bbox="1384 828 1469 868">4,692</td> <td data-bbox="1469 828 1581 868">5,612</td> <td data-bbox="1581 828 1666 868">5,990</td> <td data-bbox="1666 828 1785 868">6,926</td> </tr> </tbody> </table> <p>The busiest peak flow is 5,990 for passengers by 2039.</p> <p>The following assumptions were used:</p> <ul style="list-style-type: none"> • 12 tph per direction with 8 Thameslink and 4 EMR services • “Surge factor” to support reliance an additional 100 passengers per train to reflect trains arriving at uneven intervals • Employee growth assumed using the airport growth factors and 10% mode share in 10% in 2029 and 12% in 2039 <p>An assessment of the commuter peak was also undertaken and found that the combined demand in this period was below the passenger peak.</p>	Annual Passengers Date	25 mppa 2029		32 mppa 2039		38 mppa (test)		Typical Day	Peak Day	Typical Day	Peak Day	Peak Day	2 way Busy Hour	6,874	7,042	8,864	9,744	10,037	Arrival Busy Hour	3,626	3,794	4,510	4,924	5,230	Departure Busy Hour	4,354	4,692	5,612	5,990	6,926
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			<p>The NR parkway assessment report provides a review of passenger demand and capacity requirements for the DART stations and Luton Airport Parkway railway station associated with the planned London Luton Airport expansion scenarios at 25 and 32 mppa and a sensitivity test for a 38 mppa airport. The following layout was assessed:</p> 

Action	Description	When	Applicant's response
			<p>Figure 2.3 DART Parkway Station Layout: Level 1</p>  <p>The assessment used the Fruin Level of Service (LoS) describes pedestrian movement, relating density of pedestrians and flow rates for walkways and circulation areas, stairs and in queues, on a scale from A to F, with LoS A representing free flow and LoS F a complete breakdown in circulation. Fruin describes LoS C as being free flow, assuming a normal walking speed with opportunity to overtake. There is some difference between AITA standards and Fruin regarding space per M² for passengers. The assessment was undertaken using NR and TfL design guidance.</p> <p>The assessment covered the components of the rail station</p> <ul style="list-style-type: none"> • Vertical Circulation Elevator and lifts • Platforms • Concourse • Revenue Protection and Gatelines

Action	Description	When	Applicant's response
			<p>The assessment used the demand set out in the DART Demand Basis of Design Report using a combination of LEGION and static modelling of Lift and escalators.</p> <p>Summary of Luton Airport Parkway Impacts</p> <ul style="list-style-type: none"> • The hypothetical 38 mppa demand (sensitivity test) generates a two-way peak hour which is around 60% of previously assumed demand at 2040. • Luton Airport Parkway railway station was shown to accommodate this higher peak demand at LoS C or better, with the exception of some areas on the platforms which were shown to operate at LoS D in the peak 15 minutes at 2040. • Accordingly, when considering lower forecast demand at 32 (2039) and 38 mppa based on agreed York Aviation forecasts, the station is shown to perform at LoS C or better, as per below: • Vertical circulation – vertical circulation capacity is appropriate, with stairs and escalators providing for the majority of passengers and lifts available for up to 35% of the peak alighting load on each platform. • The new overbridge is 8m wide with additional run-off provided on the landings for escalators and queuing spaces provided for lifts. In addition, there is the existing overbridge at 3.0m width giving a total overbridge width of 11.0m which is more than the circulation width required at LoS C. • When compared to the conclusions for the Network Rail report Station Capacity Assessment: Luton Airport Parkway Station – Static Analysis dated 1st July 2016, the Arup analysis for Luton

Action	Description	When	Applicant's response
			<p>Airport Parkway railway station demonstrates that the six areas of concern raised by Network Rail will either be addressed by the new design or relieved by provision of DART.</p> <ul style="list-style-type: none"> • DART Parkway station is also shown to perform at LoS C or better at 32 mppa (DCO design scenario) and 38 mppa (sensitivity test), as per below: • Vertical circulation – demand is within the capacity of a single escalator in each direction operating at 60 people per minute. Two lifts are provided which would allow for up 35% of people going from or to street using lifts. • Gatelines – the following gateline provision achieves appropriate queuing and Level of Service performance. • Concourse – the DART concourse is estimated to be utilised to between 80% and 90% of its LoS B capacity in the 32 mppa and 38 mppa demand scenarios.
22	Provide information on the comparative cost of the previous bus service and the new DART service.	D3	The previous bus service cost £2.40 for a single and £3.80 for a return. This compares to £4.90 for a single journey on DART. DART does not offer return tickets - Luton residents can travel at half-price by scanning a QR code at the station. People with a disability and those holding an older person's bus pass can travel for free.
23	Submission of oral update provided on the DART service.	D3	Based on ticket sales, just over 1.2M passengers have used Luton DART up to 20 August 2023. That represents 16% of passenger trips to the airport in the period against a target of 17%. Considering that there have been several rail strikes during the period when ridership was clearly reduced (to virtually zero) this shows good progress and represents a 14% increase compared to users of the previous airport shuttle bus service for the equivalent period last year.

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24	If possible, provide an updated figure for the number (and percentage) of staff who are currently travelling by bus.	D3	<p>Bus mode share dropped from 16% in 2018 to 3% in 2020 during the pandemic but recovered to 10% in 2022.</p> <p>Overall, staff public and sustainable transport shares in 2022 closely resemble 2016 levels.</p> <p>The table below is extracted from the London Luton Airport Sustainability Report 2022 and provides staff mode share data for 2022.</p> <table border="1"> <thead> <tr> <th>Staff mode</th> <th>2016</th> <th>2018</th> <th>2020</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>Drive alone (%)</td> <td>68</td> <td>59</td> <td>78</td> <td>75</td> </tr> <tr> <td>Car share (%)</td> <td>7</td> <td>8</td> <td>1</td> <td>1</td> </tr> <tr> <td>Taxi (%)</td> <td>1</td> <td>1</td> <td>2</td> <td>1</td> </tr> <tr> <td>Motorcycle (%)</td> <td>1</td> <td>1</td> <td>5</td> <td>1</td> </tr> <tr> <td>Rail (%)</td> <td>7</td> <td>8</td> <td>2</td> <td>6</td> </tr> <tr> <td>Bus/Coach (%)</td> <td>9</td> <td>16</td> <td>3</td> <td>10</td> </tr> <tr> <td>Cycle (%)</td> <td>2</td> <td>2</td> <td>3</td> <td>2</td> </tr> <tr> <td>Walk (%)</td> <td>5</td> <td>5</td> <td>6</td> <td>3</td> </tr> <tr> <td>Public (%)</td> <td>16</td> <td>24</td> <td>5</td> <td>16</td> </tr> <tr> <td>Sustainable (%)</td> <td>23</td> <td>31</td> <td>14</td> <td>21</td> </tr> </tbody> </table>	Staff mode	2016	2018	2020	2022	Drive alone (%)	68	59	78	75	Car share (%)	7	8	1	1	Taxi (%)	1	1	2	1	Motorcycle (%)	1	1	5	1	Rail (%)	7	8	2	6	Bus/Coach (%)	9	16	3	10	Cycle (%)	2	2	3	2	Walk (%)	5	5	6	3	Public (%)	16	24	5	16	Sustainable (%)	23	31	14	21
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25	Provide a written copy of the oral summary provided on staff bus usage.	D3	<p>The Applicant is engaging with bus operators about how bus services can be improved, particularly for staff, recognising that there are particular corridors and catchments that are more important from a staff perspective. Looking forward, the Future Travel Plan will focus on enhancing those connections, especially east-west, which are complementary to the strong north-south connections by rail.</p>																																																							

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			<p>Through the Framework Travel Plan [AS-131], there is greater emphasis on monitoring surface access, particularly staff surveys to establish more granular data (increasing frequency of staff travel surveys from every two years to annually), and to use that information to prioritise areas of focus, to work with public transport operators, and to support appropriate interventions using the Sustainable Transport Fund.</p> <p>The Applicant has an understanding of where employees live and their time of arrival to the airport, recognising many of those trips are outside daytime working hours to accommodate the operating hours of the airport. The Applicant is looking at how best to serve those reasonably with public transport services. Noting that the rail network operates 24 hours, as does the Luton DART. This provides a connection for employees to get to work if they live along the rail corridor. Recognising that there is an opportunity to enhance bus services, their timings and how these can be delivered is a key part of the Travel Plan and the work of the Airport Transport Forum.</p>
26	Provide an update on sustainable transport fund including indicative costs and how it would be secured.	D5	The Applicant noted this action and will address at the relevant deadline.
27	Provide an update with regards to bus route 61.	D3	<p>Bus route 61 used to run between Luton and Aylesbury via Dunstable and Tring. Arriva ran it commercially for many years, but the service stopped in 2018 when it was no longer financially viable. There is now a subsidised service between Dunstable and Aylesbury run by Red Eagle.</p> <p>There are direct and frequent connections to the airport on the 'A' service from Dunstable which offers an easy and convenient</p>

Action	Description	When	Applicant's response
			connection from Aylesbury although the connecting service does not operate at a high frequency.
28	Clarification that the Airport Access Road would include segregated shared pedestrian/cycle facilities and provide relevant details.	D3	<p>The proposed design of the Airport Access Road includes a 3m wide footway along the southern side of the road between the junctions of Eaton Green Road Link and the reconfigured junction with Provost Way, which is suitable for a shared pedestrian / cycle route.</p> <p>The 3m wide shared route along AAR also connects to Eaton Green Road via the Eaton Green Road Link, and to the retained section of Percival Way via the realigned Provost Way link.</p>
29	Provide an assessment of the catchment area where staff live and whether walking/ cycling would be an option and if so how could this be maximised.	D4	The Applicant noted this action and will address at the relevant deadline.
30	Update the toolbox of intervention and measures to include an additional column which identifies the indicative timescales/ restrictions for implementation of the measures.	D4	The Applicant noted this action and will address at the relevant deadline.
31	Identify which of the toolbox interventions and measures are proposed to be implemented as part of the application.	D4	The Applicant noted this action and will address at the relevant deadline.