Luton Rising
Our airport.
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November 2023

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

8.83 Applicant's response to Written Questions - Traffic and Transportation including Surface Access

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.83

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

London Luton Airport Expansion Development Consent Order 202x

8.83 APPLICANT'S RESPONSE TO WRITTEN QUESTIONS - TRAFFIC AND TRANSPORTATION INCLUDING SURFACE ACCESS

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1 RESPONSE TO EXAMINING AUTHORITY WRITTEN QUESTIONS (TRAFFIC AND TRANSPORT INCLUDING SURFACE ACCESS)

Table 1.1: Responses to the Examining Authority's Written Questions (Traffic and transport including surface access)

PINS ID	Question / Response
TT.1.1	**Question:** **Cumulative Impacts** In relation to the North Hertfordshire's Local Plan 2011-2031 allocation sites EL1, EL2 and EL3 can the Applicant confirm if there would be any transport related impacts (both during construction and once this site is built and occupied) and, if so, how has this been included in the modelling?
	Response: The allocation sites have been classified in the Strategic Transport Modelling as 'Reasonably foreseeable' and therefore included in the Local Plan Growth Alternative Scenario test. Table 3.5: Forecast Residential Developments (greater than 250 dwellings) of the Strategic Modelling Forecasting Report (**Transport Assessment Appendices - Part 2 of 3 (Appendix F) [APP-201]**) shows this in the table as 'Hertfordshire - East of Luton – Reasonably foreseeable - 2,100 [dwellings] - 2023-2031 - Strategic site in Local Plan'. The status of the sites has recently been reviewed and upgraded in the latest Uncertainty Log information being used in the Rule 9 'Accounting for Covid-19 in transport modelling' to 'More Than Likely' and therefore included in the core modelling scenario. The transport related impacts, once built and occupied, have therefore been included in the modelling. The during construction impacts have not been considered, as this is outside the scope of the strategic modelling and transport assessment of the proposed airport expansion.
TT.1.2	**Question:** **Cumulative Impacts** In Written Representation [REP1-160] Stop Luton Airport Expansion raise a concern about the potential impact of Luton Town Football Club (LTFC) in light of the fact that they have planning permission for a new stadium which could hold up to 23,000 people. The Applicant's response to Stop Luton Airport Expansion's Written Representation stated that the modelling exercise focuses on the typical weekday AM and PM peak periods, which would not include activity associated with the football club. In addition, the planning permission associated with LTFC includes various forms of highway improvements, which the football club would be required to provide in order to mitigate the effects of traffic associated with the stadium relocation. Does the Applicant have any details of these highway improvements and if there would be any cumulative effects with the proposed airport related highway works? Does the Applicant have any information as to how this potential influx of people on a weekend would affect public transport capacity for those passengers and staff travelling to and from the airport on a weekend. If yes please signpost where this can be found and if no, why not and how might this affect the current conclusions?
	Response: The details of the proposed highway mitigation forming part of the Power Court (Luton FC) planning application can be seen on drawing number 32444/1001/SK014, within Transport Assessment Appendix 4.1G 'Off-site Corridor and Junction Layout' of the Power Court application (ref: 16/01400/OUTEIA). The proposed improvements along St. Mary's Road forming part of the Power Court application would narrow St. Mary's Road to one lane in either direction on the approach to the gyratory junction between Windmill Road, St. Mary's Road and Crawley Green Road. The Power Court application has been included within the London Luton Airport **Transport Assessment Appendices - Part 2 of 3 (Appendix F) [APP-201]** uncertainty log as 'near certain' and therefore was included within the modelling undertaken for the DCO. As part of the application for development consent, improvements are proposed to the gyratory junction between Windmill Road, St. Mary's Road and Crawley Green Road which would improve the capacity of the gyratory for all vehicles. The improvements comprise widening to the circulatory carriageway, and capacity improvements to Windmill Road and St. Mary's Road arms. These amendments would not compromise the Power Court works. The Applicant does not have information on weekend public transport capacity associated with Luton Town FC match-day activity, beyond what is set out within the Power Court Transport Assessment (Appendix 4.1). This indicates that for each bus service there would be 9 additional passengers in the pre-match hour period, and 12 additional passengers in the post-match hour period. It is not anticipated that these volumes of bus passengers would have a significant impact on airport-related bus travel. The Power Court application also undertook rail passenger occupancy surveys on a weekend period, noting passenger levels and overall occupancy at all stations between Flitwick to Harpenden. The surveys

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	concluded that for southbound services a maximum of 67% occupancy was observed between Luton Airport Parkway and Harpenden. For northbound services, maximum occupancy figures of 17% were surveyed between any of the stations from Harpenden and Flitwick. For the DCO application, the rail capacity analysis was focussed on the weekday peak periods as this is when background demand is highest. The level of hourly rail demand created by the airport is easily accommodated on the services provided from Thameslink and East Midlands Rail and as background demand at weekends is significantly lower than weekdays, there should be no cumulative concerns. The same is true of bus services in the vicinity of the airport at weekends when there may be events at the proposed Luton Town FC stadium.
TT.1.3	**Question:** **Cumulative Impacts** Can the Applicant confirm if there would be any transport related impacts to the proposed Application in relation to the construction of the Wandon End Solar farm and if so have these been accounted for in the transport assessment. If yes please signpost where this can be found and if no, why not and how might this affect the current conclusions?
	Response: The public consultation carried out in June 2022 for Wandon End Solar Farm (Wandon End Solar - www.wandonendsolar.co.uk) suggested that during construction of the site there would be approx. 20 HGV movements to / from the site per day, with construction expected to take place over a period of between 6-9 months. The published material also suggested that all construction related vehicles would access the site via roads to the south-west, rather than utilising the rural routes to the east, with site deliveries timed to avoid AM and PM highway peak periods. Given the low volumes of daily HGV construction movements there would be no material change to the operation of the highway network during the periods assessed in the London Luton Airport **Transport Assessment [APP-203, AS-123, APP-205, APP-206]**. Similarly, the Wandon End consultation material highlighted that post-construction operational vehicle movements to / from the site would be limited to occasional maintenance vehicles, and as such, traffic associated with the solar farm was not included other than as part of background traffic growth assumptions. The timelines for the Wandon End Solar Farm also indicated that the works would likely be completed by the end of 2023 and as such, no further account was undertaken in the DCO assessment.
TT.1.4	**Question:** **Traffic** In the response to **[RR-0472]** the Applicant states 'Some people may choose to take alternative routes and we have therefore taken steps to provide capacity improvements to the local network to ensure that if they do, local traffic is not adversely impacted.' Please signpost where in the application documentation it explains how these alternative routes have been determined and their locations.
	Response: Section 4 of the **Transport Assessment [APP-203, AS-123, APP-205, APP-206]** sets out (para 4.2.4) that highway interventions have been identified in conjunction with the local highway authorities in order to provide mitigation for the increased volumes of traffic on roads in the locality of the airport and the corridor to the M1. Luton Local Plan Policy LLP31A(i) states that *"the Council will work with its partners, agencies and developers to deliver: reduced congestion around the town centre and key strategic routes including seeking to deliver targeted road and junction improvements needed to accommodate Luton's growth including strategic and local improvements to address cross boundary growth while promoting sustainable modes of transport."* With regard to London Luton Airport Policy LLP31D adds *"Support for the continued economic success of London Luton Airport as a transport hub (policy LLP6) will be delivered through: measures to ensure there is capacity at strategically important junctions"* Mitigation measures have therefore been developed on the main access routes into the Airport and further supported by additional locations identified through the on-going engagement which has occurred with highway authorities around with regard to the impacts of the scheme.

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	The routes and locations on which mitigation measures are proposed are set out in **Appendix A of the 7.02 Transport Assessment Appendices - Part 1 of 3 (Appendices A-E) [APP-200].**
TT.1.5	**Question:** **Traffic** Natural England [REP1-112] raised a concern that increased road traffic generated by the airport expansion scheme could lead to an increase of traffic on minor roads in nearby parts of the AONB and that any proposed road engineering measures to mitigate this could alter the character of those lanes and the character of the landscapes they sit within. Provide details as to what specific mitigation measures could be applied within the AONB that would not alter the character of the landscape.
	Response: The Applicant has provided additional information at Deadline 1, **Trip Distribution Plans [REP1-019]** which show the traffic distribution for airport users. The distribution plots show that the vast majority of the trips to and from the Airport access from the west via the M1 Junction 10. The volume of trips generated by the airport expansion on the minor roads within the AONB are relatively small and are not considered to have a material impact necessitating mitigation. Please see **Section 9 of the Transport Assessment [APP-205]** which sets out the approach to traffic generation and distribution. In addition, the Applicant and operator will continue to work with local authorities to understand the impacts of the airport expansion through ongoing monitoring as set out within the **Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) (Appendix I of the Transport Assessment [APP-202]).** There is an opportunity through this process to identify any impacts that are being realised in future as a result of the airport expansion and seek to investigate the potential implementation of traffic management and/or parking control measures, in order to discourage vehicles from using these roads to access the airport. Further information on the OTRIMMA has been submitted at Deadline 4. Highway engineering measures that could be introduced to mitigate traffic impacts without impacting character would include traffic calming using changes to white lining, signage and kerb realignments within the highway boundary.
TT.1.6	**Question:** **Traffic** A significant number of Relevant Representations raised a concern about the increase in traffic that would be generated by the proposed expansion. Transport for London [RR-1543] stated 'The Proposed Development should not be dependent on any increase in car trips or car parking and the Applicant needs to set out a concrete package of measures to ensure this'. The ANPS states 'Heathrow Airport has committed to ensuring its landside airport-related traffic is no greater than today.' While this is not necessarily a requirement for this application, can the Applicant explain what they are doing to achieve a similar outcome?
	Response: The Applicant cannot comment on the proposals or commitments made by other airports in their own applications for expansion which were made under different circumstances and conditional to that applicant. There is no obligation on airport (or other) developments to result in no net increase in traffic, only that any impacts where identified are mitigated. The ANPS "sets out Government policy on expanding airport capacity in the South East of England, in particular by developing a Northwest Runway at Heathrow Airport" (Ref 1). Any application for a new Northwest Runway development at Heathrow will be considered under the ANPS and specifically that "Other Government policy on airport capacity has been set out in the Aviation Policy Framework, published in 2013". It is therefore unclear the relevance to the application of the statement from TfL on the applicant to achieve a similar outcome as Heathrow. It should be noted that the ANPS does not place a requirement on Heathrow to secure 'no more traffic' it is a voluntary commitment from Heathrow and would be dependent on the construction of three new rail lines, none of which are being delivered directly by Heathrow (Crossrail, Western Rail, Southern Rail). The Surface Access Strategy and Framework Travel Plan set out the measures the Applicant proposes to increase sustainable travel mode share at the airport for both passengers and staff. These will reduce the number of vehicles travelling to the airport allowing the airport to appropriately develop and refine the strategy over the period of airport development. It is also noted that passengers parking at the airport have a lower impact on vehicle trips than those using "kiss and fly" or "taxi and private hire". If additional parking was not provided this could result in an increase in vehicle trips rather than a reduction as those from areas with low public transport availability choose alternative vehicle options over public transport.
TT.1.7	**Question:** **GCG**

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	The Applicant states in their response to Transport for London **[REP1-024]** that the mode share targets identified in the Framework Travel Plan would be more ambitious than those set out in the Green Controlled Growth Framework. Please can the Applicant clarify by signposting to the relevant section within the Framework Travel Plan or provide detail as to the value of these more ambitious mode share targets.
	Response: The **Framework Travel Plan [AS-131]** does not set out the values of the mode share Targets (as distinct from the mode share Limits contained within the **Green Controlled Growth Framework [REP3-017]**). Section 4.1 of the Framework Travel Plan instead sets out how future Targets will be set, reviewed and updated as part of the production and ongoing monitoring of each future iteration of the Travel Plan. Specifically, paragraph 4.1.4(a) captures the requirement for the setting of more ambitious Targets ("Targets should strive to achieve higher levels of sustainable transport mode share than the Limits"). It is not considered appropriate to set specific mode share Targets for the first Travel Plan at this stage, due the significant variation in recent mode share trends as a result of the COVID-19 pandemic, and potential time-lag until those Targets would come into force, which could render them out-of-date (i.e. Targets set now might not be reflective of mode share levels by the time the examination has been concluded, the application for development consent granted, and the DCO subsequently implemented through the serving of notice under Article 44 of the **Draft DCO [REP3-003]**. Instead, as described in Section 4.1 of the Framework Travel Plan, the development of each Travel Plan must consider up-to-date baseline information to inform the setting of the Targets, which can be no lower than the GCG Limits (and strive to be more ambitious). The values of those Targets will need to be approved by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function, as part of the process to discharge Requirement 30 of the DCO and approve each Travel Plan.
TT.1.8	**Question:** **GCG** Can the Applicant explain how the surface access mode share targets **[APP-218]** were set for airport staff and why the percentage of airport staff travelling by non-sustainable means is set higher than that for passengers.
	Response: Firstly, for clarity, the Applicant would like to confirm the terminology used in the application, including within the **Green Controlled Growth Framework** [**REP3-017]** and **Framework Travel Plan [AS-131].** The Applicant differentiates between Limits (which are set out in the GCG Framework), and Targets (which will be required for each future Travel Plan, in accordance with the process for defining those Targets set out in the Framework Travel Plan). Table 5.1 of the **Surface Access Strategy [APP-228]** provides a summary of the distinction between the two terms used. The surface access mode share Limits within GCG correspond to the modelling assumptions for passenger and staff mode share utilised within the Transport Assessment. The transport modelling, and hence GCG, therefore correspond to the reasonable worst case scenario, for which the likely significant environmental effects are identified and reported within the Environmental Statement. GCG therefore provides certainty that the identified likely significant environmental effects will not be exceeded. The magnitude of the mode share assumptions (and consequently the surface access mode share Limits) for passengers and staff are based on a comparative analysis of other UK airports (identified in the **Transport Assessment Appendix H: Public Transport Strategy - Summary Report [APP-202]**), which included an analysis of baseline travel patterns at the airport, and the evolution of the transport offer at the airport. The results of this analysis indicated that higher levels of travel by sustainable modes for passengers could be achieved compared to staff. In addition, the staff mode share assumptions for the Future Baseline and With Development mode share scenarios (as set out in Table 9.4 of the **Transport Assessment [APP-205]**) have conservatively only been applied to the growth in staff or new staff in the future and as a result of the Proposed Development and not to existing staff, in order to assess a reasonable worst-case scenario.
TT.1.9	**Question:** **GCG** What are the current surface access mode share percentages for passengers and staff?
	Response: **2022 Passenger Data:**

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<tr><th>PINS ID</th><th>Question / Response</th></tr>
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CAA Passenger Survey data has been used to assess the passenger mode share for the twelve-month period from January to December 2022. This data has been analysed using the same methodology applied to calculate the mode shares in the Transport Assessment. The result of this analysis is presented in the table below:

2022 CAA Passenger Mode Share (%)
<table>
<tr><th>Mode*</th><th>2022 Passenger Mode Share</th></tr>
<tr><td>Drop off/taxi</td><td>48</td></tr>
<tr><td>Car park</td><td>17</td></tr>
<tr><td>Rail</td><td>23</td></tr>
<tr><td>Bus / coach</td><td>12</td></tr>
</table>
* Passengers with no reported mode of transport were excluded from the analysis

2022 Staff Data:
The table below is extracted from the London Luton Airport Sustainability Report 2022 and provides staff mode share data for 2022.

2022 Staff Mode Share (%)
<table>
<tr><th>Mode</th><th>2022 Staff Mode Share</th></tr>
<tr><td>Drive alone (%)</td><td>75</td></tr>
<tr><td>Car share (%)</td><td>1</td></tr>
<tr><td>Taxi (%)</td><td>1</td></tr>
<tr><td>Motorcycle (%)</td><td>1</td></tr>
<tr><td>Rail (%)</td><td>6</td></tr>
<tr><td>Bus/Coach (%)</td><td>10</td></tr>
<tr><td>Cycle (%)</td><td>2</td></tr>
<tr><td>Walk (%)</td><td>3</td></tr>
</table>
</td></tr>
<tr><td>TT.1.10</td><td>
Question:
GCG
The relevant and written representations highlighted a general lack of confidence that the mode share targets would be achieved. Central Bedfordshire Council LIR [REP1A-002] notes that in 2018, 24% of staff and 33% of passengers were using public transport to access the airport. However, this dropped to 5% for staff and 9% for passengers in 2020. Can the Applicant explain why they are confident that the surface access mode share targets that they have proposed are achievable?
</td></tr>
<tr><td></td><td>
Response:
Table 6.3 of the Transport Assessment [APP-204] provides a summary of the passenger mode shares from 2012 to 2020 showing the position and trend up to and including the early phases of the Covid-19 pandemic. It is acknowledged by the Applicant that during the Covid-19 pandemic there was a significant reduction in passenger travel by public transport, reducing from 38% in 2019 to 9% in 2020. However, estimates from the 2022 CAA survey data shows that the public transport mode share for passengers was 35%. This shows a strong recovery in public transport mode share from 2020. Public transport use by passengers is recovering towards pre-pandemic 2019 levels.

Despite the initial impact of Covid restrictions during the first few months of 2022 and concerns among the general public, the share of public transport usage rebounded swiftly, surpassing the levels observed between 2016 and 2018.

The Forecasts have established an initial target for the year 2027, aiming to achieve a 40% share of public transport usage. Considering the rapid recovery of public transport usage in 2022, the progressive easing of Covid restrictions throughout the year, the implementation of the DART scheme, and other planned public transport improvements, it appears that the current trends align with the airport's forecasts and targets.
</td></tr>
</table>

PINS ID	Question / Response
	Future rail capacity has been robustly assessed and the assumptions underpinning the analyses rely on pre-pandemic growth factors to ensure robustness in its approach. The analysis (**Table 11.1** of the **Transport Assessment [APP-206])** shows that at its busiest (32mppa) for the 1 Hour AM Peak there are forecast to be approximately 800 additional passengers above 2019 (18mppa) levels and that even with significant background growth there remains significant capacity in the morning. Potential interventions to support the growth of passenger numbers depend on the monitoring and evaluation carried out as part of the Future Travel Plans and linked to the **Green Controlled Growth Framework [APP-218**]. Improvements can be discussed with Train Operating Companies, Network Rail and bus operators using the Future Travel Plan development process and the Airport Transport Forum to prioritise and agree any potential service enhancements required in the future.
TT.1.11	**Question:** **Parking** In relation to the number of parking spaces, what evidence does the Applicant have to demonstrate the current level of utilisation for the existing car parks?
	Response: The airport operator has provided some recent data on car park utilisation for passenger and staff car parks. For the passenger car parks, data has been provided for the period from January 2023 to August 2023. For staff car parks, data has been provided for August 2023. The utilisation is summarised below: • For the on-site passenger car parks, the average daily peak utilisation was approximately 80% of capacity and at the busiest times, the car parks were full. • For the airport related staff car parks, the average daily peak utilisation was approximately 85% of capacity and at the busiest times, the utilisation was 94%.
TT.1.12	**Question:** **Parking** Can the Applicant supply details regarding how many people book on site car parking in advance compared to the number who turn up on the day? Are there occasions when vehicles turn up without prebooking and have nowhere to park? If yes, how many and how often does this happen, and does the Applicant have a protocol for dealing with these people in terms of providing information about alternative places to park if they cannot park on-site?
	Response: The airport operator manages car park pre-bookings to a level where it is known that the airport will have spare capacity for turn up and park passengers. This is therefore not an occurrence that the airport operator tracks or collects data on. If a car park is full then the airport has alternate car parks that passengers can use and the help button at car park entrances would be able to provide the appropriate information to turn up and park passengers.
TT.1.13	**Question:** **Parking** In Chapter 18 of the Environmental Statement [AS-030] it states, 'As part of the strategy to reduce travel by car and encourage use of public transport, parking provision will not be increased on a pro rata basis.' The Public Transport Strategy Summary Report Appendix H [APP-202] states that Luton Airport has identified Stansted as the main comparator in a benchmarking exercise. Within Appendix H it states that at 32MPPA Luton would be providing around 500 spaces per million passengers compared to Stansted, which in 2017 provided 1107 spaces per million passengers. However, Stansted airport is not closely surrounded by residential areas. Has the Applicant considered that by providing the reduced number of spaces to encourage the mode shift to sustainable transport it could aggravate the fly parking issue, and, if so, what does it propose to do to mitigate this issue?
	Response: The proposed car parking for the airport expansion was carefully considered and the issue of fly parking was recognised in Chapter 15 of the **Transport Assessment [APP-206]**. Whilst Stansted was used as the main comparator in the benchmarking for public transport, there are differences in the make-up of the non-sustainable transport mode share for passengers, which is likely to be linked to the locations. London Luton Airport is located on the south-eastern edge of Luton whereas Stansted Airport is in a less populated area with the nearest town being Bishop's Stortford. With a much larger population located within a short distance of London Luton Airport, there is likely to be a higher propensity for drop-off and pick-up trips either by taxi or by private vehicle, as opposed to parking the car at the airport, as this will often be the most cost effective and convenient option for short trips. The CAA passenger survey data for 2017 to 2019 shows London Luton Airport had a noticeably higher taxi/minicab/uber mode share than Stansted (average 6.5% higher), and although the published CAA data does not disaggregate the car mode share, it would be reasonable to assume that there would also be a higher proportion of private drop-off/pick-up trips at Luton. The consequence of this, is that less passenger car parking spaces would be required at Luton if the non-sustainable transport mode share and the number of passengers per annum was assumed to be equal at the two airports.

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	London Luton Airport had 10,550 on-site car parking spaces for passengers in 2019 which was the level of car parking required at the point when the airport reached its permitted capacity of 18 mppa. This reflected the accessibility of the airport and the needs of its users. Future passenger car parking requirements have been determined from the baseline of 10,550 parking spaces required for 18 mppa and the future car parking takes account of the growth in passengers and the assumed reduction in car parking mode share as set out in Chapter 8 of the **Transport Assessment [AS-123]**. The future year car parking therefore reflects the airport's accessibility and needs of its users and the targeted mode shift that would be supported by the measures in the Travel Plan. In addition to the on-site car parking, the Transport Assessment assumes that off-site car parking would provide part of the future parking supply for the expanded airport. The existing third party operated off-site car parks for London Luton Airport are shown on Figure 5.13 in Chapter 5 of the **Transport Assessment [AS-123].** In 2019 these off-site third party car parks provided at least 6,800 spaces. The Applicant is not pursuing off-site third-party parking options as part of the DCO but anticipates that third party off-site parking providers will seize the opportunity created by airport growth to provide proportionately greater capacity of their own operation, subject to separate planning applications. The Applicant would engage with any off-site parking operator if a positive initial response was received from the relevant local planning authority, with regard to additional or extended off-site parking facilities. The Applicant has undertaken discussions with Local Highway Authorities about fly-parking associated with airport users. This takes place outside of the airport on land that is outside the Applicant's control. The **Framework Travel Plan [AS-131]** includes measures that can be introduced to mitigate the effect of fly-parking. These include 'supporting the expansion of the residents parking zone to the north of the airport' and 'carrying out feasibility studies on restricted parking zones (RZs)'. Actioning of these and related measures would be governed through the Airport Transport Forum. Discussions are on-going with other Local Highway Authorities regarding other locations where fly-parking may be taking place and actions are being agreed for how these locations can be monitored.
TT.1.14	**Question:** **Rail** Luton Borough Council LIR [REP1A-004] raises a concern that the draft DCO is not clear how maximising the number of rail services calling at Luton Parkway Station would be achieved. The Applicant responded [REP2A-007] that future engagement with the Council on this matter is required. Please can the Applicant confirm that it is engaging with the Council on this matter and describe what progress is being made. If they are not engaging yet, what is the timescale for this?
	Response: The Applicant has been in discussions with LBC regarding this matter and the two parties now have an agreed position. This is captured in LBC SoCG ID ref LBC23.
TT.1.15	**Question:** **DART** Is there any plan to reduce the DART fares in the future to encourage usage, and if so how would this be secured?
	Response: Whilst there are no specific plans to reduce DART fares to encourage more use, it should be noted that the DART system is owned by the Applicant and as such the Applicant has the ability to takes such steps as may be required to increase the attractiveness of DART to passengers. Since the service opened in March 2023 early indicators are that passenger usage is high and following COVID the public transport mode share is recovering. Based on ticket sales, just over 1.2M passengers have used Luton DART up to 20 August. 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.
TT.1.16	**Question:** **DART** Will passengers (and staff) be able to use the proposed DART extension for free for travel between terminal 1 and the proposed terminal 2.

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	Response: Staff will be able to use DART to travel between the two terminals throughout the day where this is necessary as part of their duties. Passengers with a ticket to use DART will be able to travel to either terminal. It is not envisaged that there will be any significant demand for passenger travel between the two terminals due to the nature of operations at the airport, but where this is the case, a valid ticket will be needed. No decision has been taken on what fare, if any, would be applicable for inter-terminal passenger travel.
TT.1.17	**Question:** **Bus and Coach** Can the Applicant provide a summary of the discussions it has had with bus providers (which aimed to increase the coverage and frequency of services to the airport), and, considering these discussions, does the Applicant have confidence that the additional proposed spaces can and would be utilised by operators?
	Response: The Applicant and operator are supportive of measures to improve sustainable travel modes and will work with local authorities and bus and coach service providers to implement improvements wherever reasonably practicable. The Proposed Development will enhance public transport infrastructure at the airport with increased bus and coach capacity proposed at Terminal 1 and new facilities at Terminal 2 that separate coach and bus activities. The Proposed Development will deliver almost triple the existing bus and coach capacity at the airport. The number of additional bus and coach bays forming part of the T1 and T2 proposals are the maximum bay provision, and the correct number of bays would be delivered to meet the required demand as part of the detailed design, as informed by discussions with bus and coach operators. At present, Luton Airport's bus station is provided as a free facility for bus operators to access. The airport operator is in the process of re-tendering coach services at the airport as the current contracts run out in Feb/Mar 2024. The contract period for the concession is normally 5 years, however, the new concession agreements will be for 5 years with an option to extend by 2 years (subject to the operators meeting service level requirements)and demonstrating growth in coach patronage. Contracts have been restructured to allow the facility to introduce mechanisms to encourage growth, such as different fee structures to incentivise start-up services. The airport operator will work with the new coach operators to consider opportunities to introduce new coach routes and ways to encourage airport users to travel via coaches. The Applicant and operator are engaging in discussions with local operators to develop understanding of their current and planned routes, and what interventions and measures would enhance their service offering. Engagement is ongoing and is supported by the Applicant's study into current gaps in bus provision and areas that would most benefit from improved/new services.
TT.1.18	**Question:** **Bus and Coach** Can the Applicant confirm that if proposed new routes are not initially commercially viable that the sustainable transport fund would be used to support operators in running these services until the demand is such that they are able to operate commercially? If yes, how would this be secured so that the ExA can afford it weight when reporting to the Secretary of State? And if no, why not?
	Response: The Sustainable Transport Fund will be used to fund improvements to sustainable transport options including services and infrastructure related to public transport and cycling and walking. It will contribute towards realising the Surface Access Strategy's Vision, Objectives and Priority Areas, aligned to targets as set out in the successive Travel Plans. The FTP identifies a number of potential bus improvements, including new, improved and extended services, although it is noted that this is not an exhaustive list of potential interventions, which can be added to. Interventions to be taken forward will be determined on production of the first Travel Plan post-consent, and in successive five-yearly Travel Plans.. Funding for bus services has been raised by authorities as a future intervention for the TPs, however, no interventions will be selected until the formation of the ATF Steering Group post-consent. Therefore, the STF could be used for this purpose, among a number of other possible interventions identified in the FTP.
TT.1.19	**Question:** **Cycling and Walking** How has the Applicant taken account of the Department for Transport Cycle Infrastructure Design guidance (Local Transport Note 1/20) in the design of the proposed off-site highway works? If there are any locations where the recommendations in LTN1/20 cannot be achieved identify the location(s) and detail the reasons why.

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	Response: Local Transport Note (LTN) 1/20 provides guidance to local authorities on designing cycle infrastructure. The document principally sets out guidance for the delivery of dedicated cycle infrastructure schemes. The document also provides guidance on the delivery of new and improved cycle infrastructure as an integral part of general highway improvements and as part of new developments and when making alterations to links and junctions on existing highways. LTN 1/20 notes that routes should be planned holistically as part of a network - isolated stretches of provision, even if individually good are of little value. The proposed off-site highway mitigation works have been principally designed to accommodate increased volumes of traffic given that the development will only generate limited numbers of additional walking and cycling trips by the very nature of an airport trip. At many off-site junctions, additional traffic capacity is therefore required to be provided so that it addresses airport growth, together with traffic associated with committed developments and background traffic growth. In the majority of locations this is achieved through the conversion of roundabouts / mini roundabouts to signalised junctions, or through the provision of additional traffic lanes. Nevertheless, the scheme offers significant opportunities for improvements for cycle provision at a number of locations as set out below: - Wigmore Lane: Wigmore Lane (between Crawley Green Road and Eaton Green Road) currently provides shared use pedestrian/cycle facilities on both sides of the road. The route is intersected by a series of roundabouts. The proposed works to this area upgrade the existing uncontrolled roundabout junctions to signal controlled junctions incorporating signal-controlled crossings. The detail of the works is subject to on-going discussions with LBC and could include advanced cycle lanes and Toucan crossings. Where possible, the widths of the existing provision along Wigmore Lane are proposed to be improved. - Airport Access Road (AAR): An off-road shared pedestrian and cycle facility is included along the length of AAR, between Eaton Green Road and the interface with the retained section of Percival Way. The current estimated demand for those walking and cycling to the airport has suggested that a shared facility in this location is sufficient and appropriate, in line with best practice guidance. - London Road (north and south): The proposed amendments to the two roundabout junctions would retain the existing off-road cycle facilities, with informal crossing facilities at side road junctions. - Vauxhall Way corridor: Whilst the Vauxhall Way corridor forms part of the future baseline and would be provided by others, this corridor incorporates off-road cycle facilities along the entire length of the route between Stopsley Way in the north and Kimpton Road / Airport Way to the south. The proposed LBC Local Cycling and Walking Infrastructure Plan (LCWIP) document includes a route along Kimpton Road and Airport Way which interacts with Vauxhall Way. - Eaton Green Road: The proposals for mitigation at the junctions with Frank Lester Way and Lalleford Road replace the existing junctions with signal controlled junctions which complement the LCWIP proposals for a route travelling between Wigmore Lane and Vauxhall Way along Eaton Green Road. - Gipsy Lane / Windmill Road corridor: The proposed off-site highway mitigation measures on this corridor do not specifically include cycle provision, however signalisation of the Kimpton Road junction would again allow cycle priority to be included through Advanced Stop Lines (ASLs), and signalised crossing points are also provided. - Within the area of the replacement parkland and reconfigured Wigmore Park, the proposed new footways and PRoWs would be of a sufficient width to provide segregated cycle routes, if required due to expected usage volumes, which meet the various criteria set out within LTN 1/20. It is noted that the junctions located within Hitchin do not specifically include improved cycle facilities, as the North Herts LCWIP document did not highlight these routes as priority routes requiring improvement. However, as previously noted the Applicant will continue to engage with Hertfordshire in developing the proposed mitigation measures at these locations, which could include improvements to cycle provision. Similarly, the M1 J10 proposals do not include improvements to pedestrian or cycle provision, as this junction currently has no pedestrian or cycle accessibility, and this would be an inappropriate location for such facilities given that it provides access to the motorway. As such, whilst there are a limited number of locations where new cycle routes or cycle-specific facilities are proposed as part of the application for development consent, or where the schemes interact with existing cycle routes, many of the mitigation proposals have been designed to accommodate cycle movements where possible. For example, the AAR and Eaton Green Road Link proposals comprise a minimum width 3.0m shared route along the southern side of the carriageway, which as per LTN 1/20 guidance is considered appropriate given the relatively low volumes of pedestrian or cycle movement along this route. Improved crossing points are also provided at junctions and at standalone locations along the AAR route, to provide a continuous off-road cycle facility between Eaton Green Road and Percival Way. However, at many other locations where off-site highway mitigation is proposed, it would not always be desirable to provide dedicated standalone cycle facilities, as these standalone facilities would not assist in providing a continuous route for cyclists and would instead result in inconsistent cycle provision, which as LTN 1/20 suggests can result in

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	cyclists avoiding the facilities. Despite this, at several locations where signalisation of junctions is proposed, it would be possible to provide ASLs to provide cycle priority for on-carriageway movements, with signalised crossings also provided within the junctions to improve crossing provision. In many locations the provision of signalised junctions would also potentially enable the subsequent construction and delivery of off-road cycle routes.
TT.1.20	**Question:** **General** ISH4.SA.01 [EV9-002] stated 'The Applicant's responses to John A Smith's and Christopher Smith's Open Floor Hearing 1 submission are incorrectly referenced. Please provide the correct references.' The Applicant's response [REP3-074] did not answer this question. Please provide an appropriate response.
	Response: The correct reference is the **Trip Distribution Plan [REP1-019]** which have been updated and resubmitted at Deadline 4.
TT.1.21	**Question:** **General** ISH4.SA.04 [EV9-002] stated 'Several Relevant Representations raised concern that construction of the proposed Eaton Green Link Road would breach the local plan adopted in 2017. Can the Applicant signpost the ExA to where it has responded to this concern.' The Applicant's response [REP3-074] did not answer this question. Please provide an appropriate response specifically in relation to the concern that the Eaton Green Link Road breaches the local plan.
	Response: The Applicant's response to ISH4.SA.04 stated that *"The Applicant has responded to this issue within Volume 8 Additional Submissions (Examination) 8.31 Applicant's Response to Relevant Representations - Part 2C of 4 (Non-Statutory Organisations) [REP1-023], page 79-80: "The Application also proposes the Airport Access Road (AAR), similar to Century Park Access Road (CPAR) permitted under an earlier local planning application, to connect Airport Way to the consented Century Park development (now known as Green Horizons Park) which is located to the east of the Airport."* To provide further context to this response, the breach of the 2017 Local Plan was considered in detail in the planning application for New Century Park and the Century Park Access Road (CPAR) which it is noted post-dated the adoption of the Local Plan (adopted in November 2017). The adopted Local Plan includes Policy LLP6D(i) (London Luton Airport Strategic Allocation) states (with regard to Century Park) *"details of the proposed access, which shall be via the extension of New Airport Way (which connects the airport to M1 J10A) and shall link Percival Way through to Century Park (as shown by the arrow on the Policies Map), such access shall be designed so as to ensure that no use is made of Eaton Green Road to provide access to Century Park or the Airport, except for public transport, cyclists, pedestrians and in case of emergency."* The New Century Park application, submitted in December 2017 which included the Eaton Green Link Road. At the time of the application, a number of objections were raised by consultees around the inclusion of the Eaton Green Link Road resulting in the new road and access to Eaton Green Road, together with a continued increase in airport traffic, would combine to make the current levels of congestion worse. The implications of the Eaton Green Link Road were considered in detail in the application which clearly demonstrated that the inclusion of the Eaton Green Link Road (in conjunction with CPAR) would reduce traffic flows on Eaton Green Road and that the link road delivered traffic related benefits. The planning officer's committee report notes that there are elements of policy LLP6 with which the proposed development of New Century Park does not accord including LLP6D(i) – the connection to Eaton Green Road. The committee report notes that extensive work had been undertaken including assessment of the impacts in the absence of the Eaton Green Link Road which had shown that with no new link connection traffic builds the surrounding road network including on Vauxhall Way, Crawley Green Road and Eaton Green Road leading to tailbacks to Wigmore Lane with the local road network fully congested. The planning officer's committee report goes on to note that the modelling demonstrates that with the new link proposed between Eaton Green Road and the New Century Park access road, considerable benefits are provided to traffic flow on Eaton Green Road (reduced traffic volumes) and at its junctions, which have knock on benefits to the wider local road network in easing congestion in the surrounding area. The planning officer's committee report concludes that whilst the proposed link between Eaton Green Road and the New Century Park access road may be contrary to policy LLP6D(i), there are traffic and transport benefits that will arise from its provision. The committee report acknowledges that the application does give rise to some apparent conflict with the development plan, with the inclusion of the link to Eaton Green Road but that the overall benefits that the proposed development will deliver are considered to outweigh any conflict with the development plan.

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	The relevant local planning authority has already considered the merits of the Eaton Green Link Road and concluded that there is a sound justification for allowing this link contrary to the provisions of its own Local Plan. As noted in our response to ISH4.SA.04 *"The AAR is included as part of the application for development consent and provides the certainty that the road would be delivered ahead of the time it would be relied upon for access to the expansion area east of the existing airport."* As such, the benefits outlined within the planning permission for New Century Park would continue to be realised. Traffic flows for the Proposed Development in Table 1.1 Annual Average Daily Traffic (AADT) flows of Appendix 18.2 Selected Traffic Flow Modelling Results **[APP-129]**) show with the inclusion of the Airport expansion including Airport Access Road (formerly the Century Park Access Road) and the Eaton Green Link Road traffic flows on Eaton Green Road are reduced between Vauxhall Way and the Eaton Green Link Road when compared to the future baseline and that the benefits of the link road identified at the time of the New Century Park planning application remain. Removal of the Eaton Green Link Road would likely displace significant traffic on to other local roads including Eaton Green Road, Vauxhall Way, Crawley Green Road as was shown to be the case on the New Century Park planning application.
TT.1.22	**Question:** **Parking in Wigmore Valley Park** Stop Luton Airport Expansion [REP1-162] raised a concern that Wigmore Valley Park car park may become overcrowded due to air passengers using it inappropriately for 'kiss and fly' and longer stay parking due to its proximity to the proposed Terminal 2. Can the Applicant detail what measures it would propose to implement to prevent this issue and how these would be secured.
	Response: The Wigmore Valley Park car park has a maximum stay of 3 hours, which is free of charge. The car park is also monitored and has signage warning users that there is a penalty charge of up to £100 for breaching the parking terms. Therefore, it is not suitable for air passengers to use for long stay car parking. Air passengers could conceivably seek to use the car park as a drop-off/pick-up to avoid short stay parking charges at the airport, albeit charges are low for a short drop-off/pick-up compared to longer term car parking. However, the walking distance and environs between the Wigmore Valley Park car park and Terminal 2 does not make use of the car park a particularly attractive option. The walking distance via designated footways on Eaton Green Road, the proposed Eaton Green Road Link and airport access roads would be approximately 1 km including five road crossings. A shorter walking route would be across Wigmore Valley Park into Green Horizons Park to access Terminal 2. Whilst this route would be approximately 400m shorter than using the designated footways, there is no footpath linking the car park with Green Horizons Park, and the parkland in this area is also being regraded to accommodate the Proposed Development. This means passengers would have to transport luggage across parkland grass and on a gradient. Neither of these walking routes make using Wigmore Valley Park for kiss and fly a particularly attractive option. Nevertheless, the Applicant has undertaken discussions with Local Highway Authorities about fly-parking associated with airport users. This takes place outside the airport on land that is outside the Applicant's control. The **Framework Travel Plan [AS-131]** includes measures that can be introduced to mitigate the effect of fly-parking. These include 'supporting the expansion of the residents parking zone to the north of the airport' and 'carrying out feasibility studies on restricted parking zones (RPZs)'.

REFERENCES

Ref 1 Airports National Policy Statement (ANPS): new runway capacity and infrastructure at airports in the South East of England, June 2018, Department for Transport, page 11