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# London Luton Airport Expansion

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**8.97 Outline Transport Related Impacts Monitoring and  
Mitigation Approach (TRIMMA)**

Infrastructure Planning (Examination Procedure) Rules 2010

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**The Planning Act 2008**

**The Infrastructure Planning (Examination Procedure) Rules 2010**

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

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**8.97 OUTLINE TRANSPORT RELATED IMPACTS  
MONITORING AND MITIGATION APPROACH (TRIMMA)**

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# Contents

	Page
<b>1 Introduction</b>	<b>1</b>
1.1 The Proposed Development	1
1.2 Overview	1
1.3 Purpose of this document	2
<b>2 Governance of the TRIMMA</b>	<b>3</b>
<b>3 Mitigation Type 1 (MT1)</b>	<b>5</b>
3.1 Scope	5
3.2 Applicable timeframe of monitoring	6
3.3 Monitoring process	6
3.4 Third party off-site car parking	12
<b>4 Mitigation Type 2 (MT2)</b>	<b>14</b>
4.1 Overview	14
4.2 Indicative Principles of MT2 Governance	14

## Tables

Table 2.1: Mitigation types

Table 3.1: Locations where mitigation (Type 1) is proposed, identified through the Transport Assessment [AS-123]

Table 3.2: Overview of baseline data requirements for MT1

Table 3.3: List of airport sites and potential data sources

Table 3.4: Potential forms of MT1

Table 4.1: MT2 examples

Table 4.2: Example Indicative Principles for the RIF

## Figures

Figure 2.1: Overview of proposed TRIMMA governance process for MT1

Figure 2.2: Overview of proposed TRIMMA governance process for MT2

Figure 3.1: Monitoring timeframe scenarios for MT1

Figure 3.2: MT1 annual monitoring process

Figure 3.3 MT1 monitoring process overview

Figure 3.4: Indicative locations of survey cameras associated with MT1

Figure 3.5: MT1 monitoring process overview

Figure 4.1: MT2 proposal process

# 1 INTRODUCTION

## 1.1 The Proposed Development

- 1.1.1 This document has been prepared to support the application for development consent for the proposed expansion of London Luton Airport ('the Proposed Development'), submitted by Luton Rising (the Applicant). The Applicant is a business and social enterprise owned by a sole shareholder, Luton Borough Council, for community benefit.
- 1.1.2 The Proposed Development builds on the current operational airport with the construction of a new passenger terminal and additional aircraft stands. This will take the overall passenger capacity to 32 million passengers per annum (mppa).
- 1.1.3 The existing infrastructure and supporting facilities at the airport, including transport infrastructure, will be improved to support the increase in demand.

## 1.2 Overview

- 1.2.1 This document is Revision 1 of the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA), originally included as Appendix I of the **Transport Assessment [APP-202]**. It represents an update to the version submitted as part of the application for development consent to reflect the ongoing development of the approach to mitigation.
- 1.2.2 The OTRIMMA will be the basis for the future Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA), which is secured by requirement 29 of the **Draft Development Consent Order (DCO) [REP3-033]**. The final TRIMMA must be substantially in accordance with this OTRIMMA and be approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function. The airport cannot operate above its extant passenger cap until the TRIMMA has been approved.
- 1.2.3 The TRIMMA will set out the Applicant's approach to monitoring and mitigating impacts on the highway network as a result of the Proposed Development. It is proposed as an agile mechanism for responsibly addressing traffic-related uncertainty, enabling the Applicant and the airport operator to proactively detect and introduce mitigation on the highway network at the appropriate time.
- 1.2.4 The previous OTRIMMA (contained in Appendix I of the **Transport Assessment [APP-202]**) set out the indicative proposals to be followed and

considered when developing the full TRIMMA. This updated OTRIMMA documents the proposed strategy for:

- a. monitoring the impact of traffic growth related to the Proposed Development on parts of public highway;
- b. agreeing the need for and form of mitigation required because of traffic growth related to the Proposed Development as identified in Schedule 1 of the **Draft DCO [REP3-003]**; and
- c. agreeing mitigation for residual traffic-related impacts to be funded by the Residual Impact Fund (RIF).

1.2.5 This document aims to respond positively to stakeholder representations, which identified concerns about issues such as proactive monitoring of the public highway, highway impacts in addition to those documented in the **Transport Assessment [APP-200 to APP-203, AS-123, and APP-205 to APP-206]** and stakeholders' desires to be represented in these matters.

1.2.6 The RIF for Type 2 Mitigations, as described in Section 4, will be secured in the section 106 agreement (please refer to Section 5.8 of the **Planning Statement [AS-122]** for further information).

### **1.3 Purpose of this document**

1.3.1 This document has been prepared to provide additional information to support the application for development consent and the Examination process.

1.3.2 It is being submitted as part of the Applicant's Deadline 4 response. This is a working document and may be subject to further review and update during the Examination process.

1.3.3 The document contains sections on the following topics:

- a. governance of the TRIMMA;
- b. processes associated with mitigation proposed in the application for development consent (Mitigation Type 1); and
- c. processes associated with mitigation of other impacts (Mitigation Type 2).

## 2 GOVERNANCE OF THE TRIMMA

2.1.1 **Table 2.1** defines the two types of mitigation (MT) which may be delivered through the TRIMMA. These, and other individual components of this process, are explained further in this document.

Table 2.1: Mitigation types

	Type	Description	Basis for delivery of mitigation
MT1	Proposed works	‘Offsite Highway Works’ contained in Schedule 1 of the DCO	Secured as identified works at Schedule 1 of the DCO
MT2	Residual impact works	Mitigation for ‘residual’ traffic-related impacts that may arise from the Proposed Development	Secured by agreement of the Airport Transport Forum (ATF) Steering Group and funded via RIF, as established through the section 106 agreement

2.1.2 The TRIMMA will be governed by a subgroup of the ATF Steering Group (hereafter referred to as the ‘Steering Group’) which will be chaired by the airport operator.

2.1.3 Membership of the Steering Group will comprise relevant highway authorities (Luton Borough Council, Hertfordshire County Council, Central Bedfordshire Council, Buckinghamshire Council, National Highways), the Applicant and the airport operator.

2.1.4 Under the Steering Group, multiple activities will occur, dependent on the type of mitigation:

- a. MT1: The airport operator will annually present a monitoring report, documenting the results and conclusions of their traffic monitoring of MT1 locations, in relation to whether thresholds for mitigation at specific locations have been met. This will inform whether to bring forward works in Schedule 1 of the DCO, or whether no action is to be taken at that stage. Once the threshold for a location is triggered, discussions take place directly with the relevant highway authority (outside of the Steering Group) regarding the implementation of MT1 works at the relevant location.
- b. MT2: A highway authority may present an opportunity for a location where there are concerns that mitigation may be required. It would be the responsibility of the highway authority to fund and undertake monitoring, or present a study on that location for consideration.

2.1.5 The governance processes for MT1 and MT2 are as follows:

- a. **Figure 2.1** illustrates an overview of the proposed TRIMMA MT1 governance process.
- b. **Figure 2.2** illustrates an overview of the proposed TRIMMA MT2 governance process.

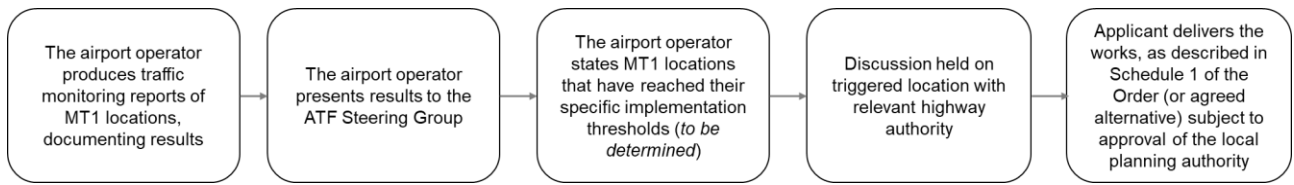


Figure 2.1: Overview of proposed TRIMMA governance process for MT1

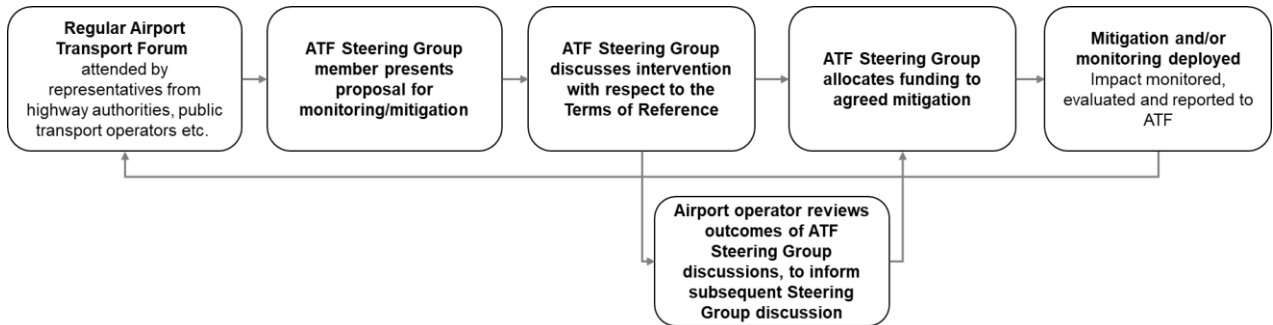


Figure 2.2: Overview of proposed TRIMMA governance process for MT2

### 3 MITIGATION TYPE 1 (MT1)

#### 3.1 Scope

3.1.1 As stated above, MT1 comprises the 'Offsite Highway Works' contained in Schedule 1 of the DCO.

3.1.2 **Table 3.1** below describes the locations of such mitigation (referred hereafter as 'MT1 locations'). There are eighteen works proposed (including three phases of works at Junction 10 of the M1, but excluding Airport Access Road), included in the DCO, to be delivered when necessary during each assessment phase as identified throughout the TRIMMA (see Table 8.1 of the **Transport Assessment [AS-123]** for further details of the proposed mitigation at each location).

Table 3.1: Locations where mitigation (Type 1) is proposed, identified through the Transport Assessment [AS-123]

Work No. 6e	Name/Location
6e(a)	Windmill Road / Kimpton Road
6e(b)	A1081 New Airport Way / B653 / Gipsy Lane
6e(c)	A1081 New Airport Way / A505 Kimpton Road / Vauxhall Way
6e(d)	Eaton Green Road / Lalleford Road
6e(e)	Wigmore Lane / Crawley Green Road
6e(f)	Eaton Green Road / Wigmore Lane
6e(g)	A1081 / London Road (North)
6e(h)	A1081 / London Road (South)
6e(i)	Windmill Road / St. Mary's Road / Crawley Green Road
6e(j)	Crawley Green Road / Lalleford Road
6e(k)	A602 Park Way / A505 Upper Tilehouse Street
6e(l)	A505 Moormead Hill / B655 Pirton Rd / Upper Tilehouse Street
6e(m)	A602 Park Way / Stevenage Road
6e(n)	M1 J10 (Phase 1)
6e(o)	M1 J10 (Phase 2a)
6e(p)	M1 J10 (Phase 2b)
6e(q)	Eaton Green Road / Frank Lester Way
6e(r)	A505 Vauxhall Way / Eaton Green Road



### 3.2 Applicable timeframe of monitoring

3.2.1 Monitoring will commence following the approval of the TRIMMA after the issuance of the ‘notice to grow’, pursuant to article 44(1) of the DCO. TRIMMA-related monitoring will occur until the scenarios outlined in **Figure 3.1** are met.

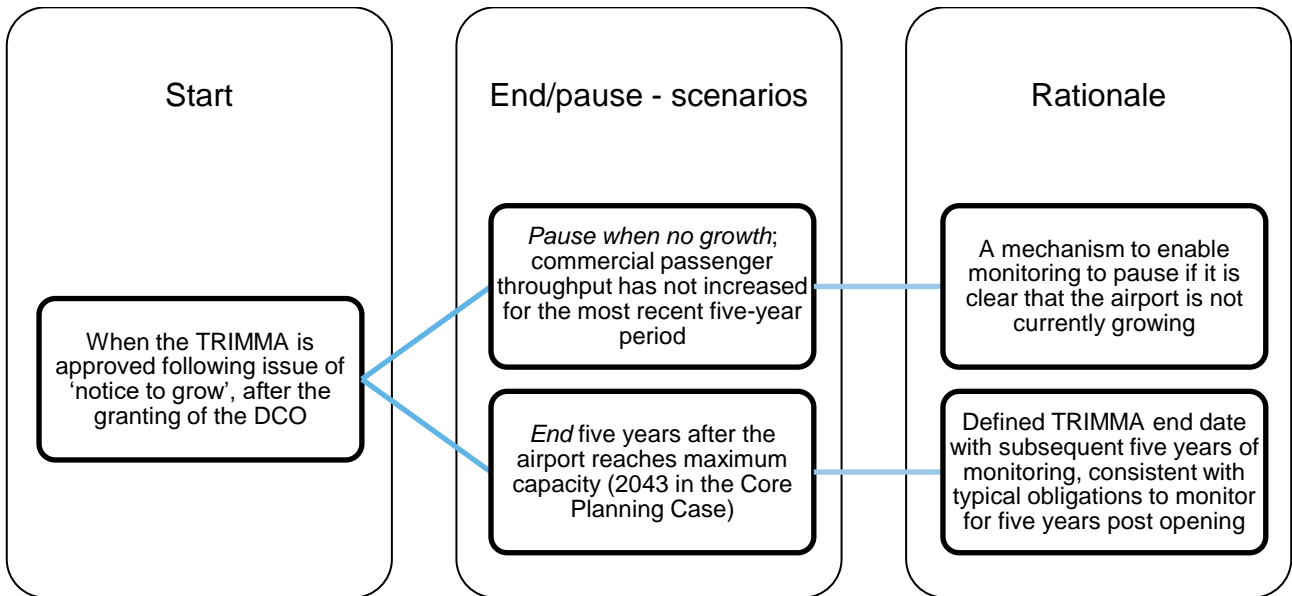


Figure 3.1: Monitoring timeframe scenarios for MT1

### 3.3 Monitoring process

#### Overview

3.3.1 Monitoring associated with this mitigation will be undertaken by the airport operator to identify when mitigation is required as a result of traffic growth related to the Proposed Development. After the establishment of an updated baseline (following the issuance of the ‘notice to grow’ pursuant to article 44(1) of the DCO), monitoring will occur annually and will follow the outline process in **Figure 3.2**.

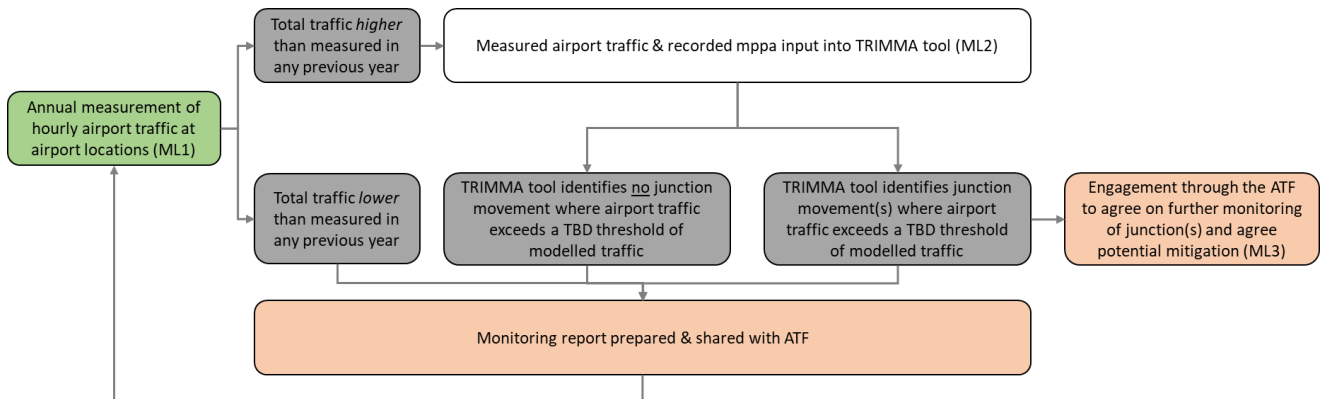


Figure 3.2: MT1 annual monitoring process

### 3.3.2

**Figure 3.3** shows an overview of the monitoring process over a five-year cycle; the Applicant and airport operator will aim to align the five-yearly traffic surveys with the Travel Plan cycle and Green Controlled Growth monitoring. The four 'monitoring levels' (ML) are detailed in this section and may be briefly described as follows:

- a. ML0: One-off monitoring to establish the approximate baseline of pre-growth airport trips and to compare pre-growth non-airport traffic with traffic from 2016.
- b. ML1: Annual monitoring of airport traffic at airport sites (such as car parks).
- c. ML2: Annual monitoring of airport traffic at MT1 locations – triggered if ML1 traffic volumes exceed ML0 traffic volumes, or traffic volumes measured in ML1 in any year after the issuance of the notice to grow.
- d. ML3: Monitoring of certain MT1 locations – triggered if ML2 traffic volumes exceed a pre-defined threshold of airport traffic.

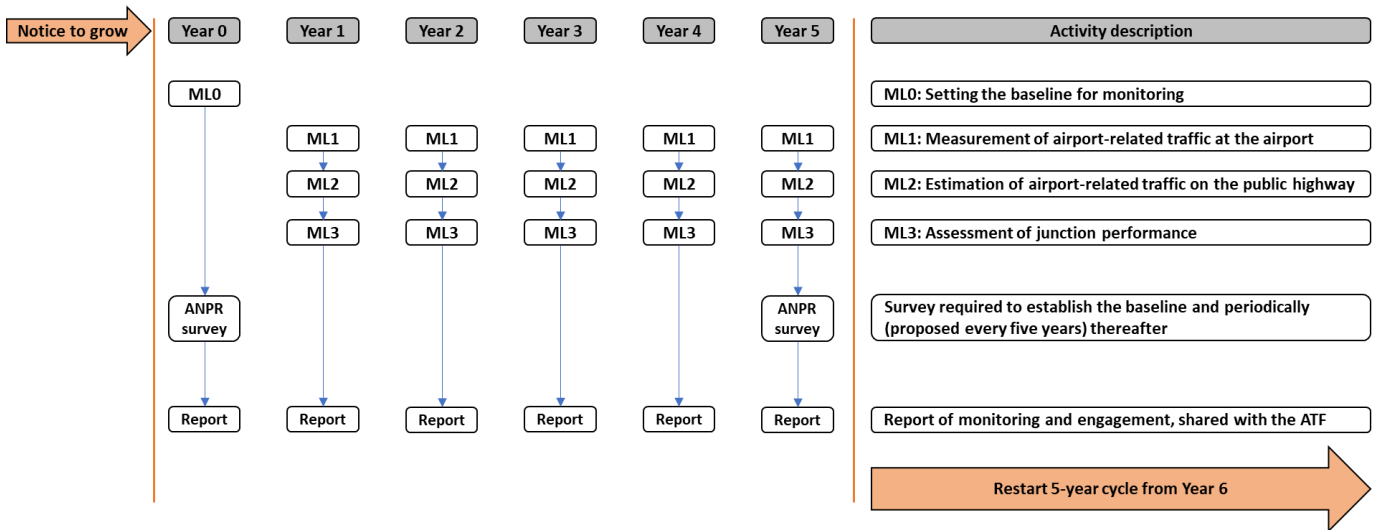


Figure 3.3 MT1 monitoring process overview

### Monitoring Level 0 (ML0) – baseline

3.3.3 ML0 will establish the updated baseline against which traffic volumes will be compared. This will be established following the issuance of the notice to grow pursuant to article 44(1) of the DCO, and will thus closely represent traffic flows when the extant planning capacity is reached. The baseline data to be collected is listed in **Table 3.2**.

Table 3.2: Overview of baseline data requirements for MT1

Traffic type	Data collected	Purpose	Method
Airport	Total trips starting and/or ending at airport sites	Define the baseline to trigger ML2	Data accessible to the airport operator
Airport	Movements: <ul style="list-style-type: none"> <li>Between airport sites and MT1 locations</li> <li>At MT1 locations</li> </ul>	Update the geographic distribution of trips – to estimate the routes used by airport traffic	Appropriate traffic collection methodology (e.g. ANPR surveys or best available technology)
Non-airport	Movements through MT1 locations	A re-base of trips previously modelled, to be reviewed to assess implications on ML3 thresholds	

3.3.4 Current airport sites are listed in **Table 3.3**. The potential sources of this data (for yearly monitoring) are also listed.

Table 3.3: List of airport sites and potential data sources

Location	Potential source
Staff car parking facilities	TBC
Passenger car parking facilities	Entry/exit barriers
Drop-off and pick-up facilities	Entry/exit barriers
Car hire centre	TBC
Delivery/servicing areas	Delivery/waste reporting
Bus/coach stations	Bus operators Bus station controller

- 3.3.5 An appropriate traffic collection survey (e.g. ANPR surveys or best available technology) will be conducted during ML0, which will be designed to ensure that the movement of traffic at all MT1 locations is surveyed and to gain an updated understanding the of distribution of airport trips. A two-week survey conducted during a neutral month<sup>1</sup> is currently proposed. The survey is proposed to be repeated every five years, so that the distribution of airport-related trips can be updated.
- 3.3.6 **Figure 3.4** illustrates the locations on the public highway at which survey cameras (one per direction of travel) are considered likely to be required for this survey; these will be supplemented by cameras at airport sites, to complete the dataset.

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<sup>1</sup> September to November or February to May, not coinciding with school/bank holidays, relevant industrial action or major road closures in the area.

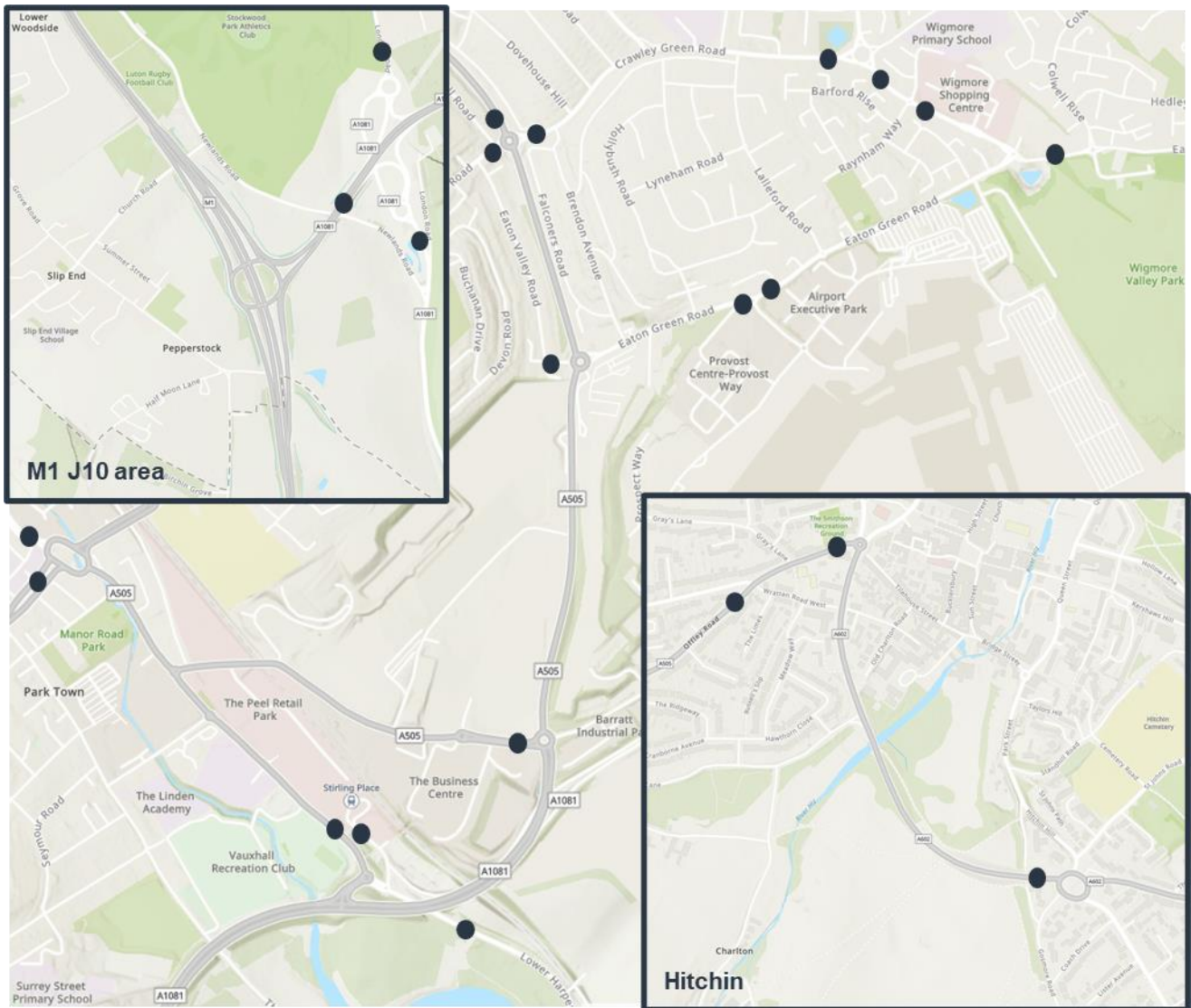


Figure 3.4: Indicative locations of survey cameras associated with MT1

### Monitoring Level 1 (ML1) and Monitoring Level 2 (ML2)

3.3.7 Total trips starting and/or ending at airport sites will be counted yearly, using data collected from existing data sources within the airport. **Figure 3.5** is a visualisation of how this data will be used.

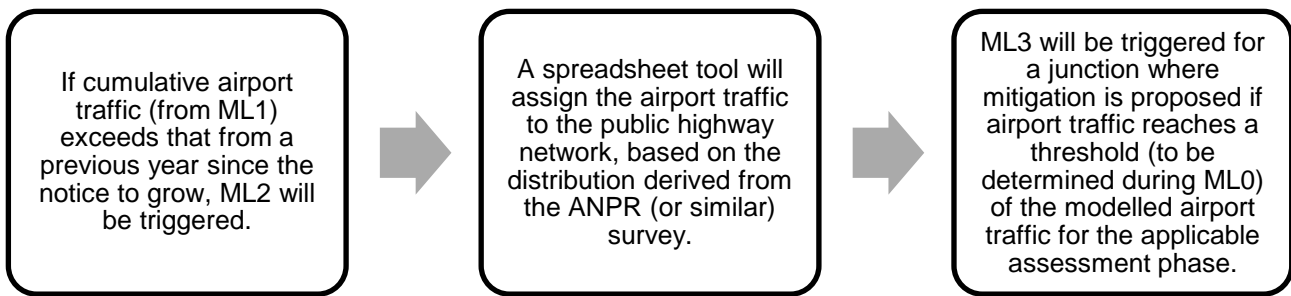


Figure 3.5: MT1 monitoring process overview

- 3.3.8 The spreadsheet tool (which will be updated after every ANPR, or similar, survey to update the distribution of airport traffic) will be developed in advance of Year 1 to effectively automate ML1 and ML2. The necessary yearly inputs to the tool are:
- Cumulative airport traffic → to determine if the volume of airport traffic has increased.
  - Airport passenger volumes → to identify the applicable modelled traffic flows, which vary by assessment phase.
- 3.3.9 The threshold of the modelled airport traffic for the applicable assessment phase<sup>2</sup> will depend on the level of background traffic surveyed at ML0. The thresholds for each movement/junction will be agreed by the Applicant and applicable highway authorities. The process for doing so will be documented in the final TRIMMA and will have considered:
- Any difference between the current (2016) baseline data and the non-airport traffic surveyed in ML0.
  - The complexity of the proposed mitigation – more complex works would likely lead to a lower threshold due to the increased amount of design and approval time.
- 3.3.10 When these thresholds are met, ML3 will be triggered.

### Monitoring Level 3 (ML3)

- 3.3.11 If ML3 is triggered for any junction at an MT1 location, the Applicant and applicable highway authorities will agree on:
- Further junction-specific monitoring to assess junction performance.
  - The form of mitigation to be delivered (should it be required), per **Table 3.4**.
  - An 'implementation threshold' (higher than the ML2-ML3 threshold previously described) at which any necessary mitigation measures will be implemented.

<sup>2</sup> Phase 1, Phase 2a or Phase 2b, as defined in the **Transport Assessment [APP-203]**, each of which contains modelled AM and PM peak hour traffic flows for all movements through the junction associated with the MT1 locations listed in Schedule 1 of the DCO.

Table 3.4: Potential forms of MT1

Form of mitigation	Responsibility for delivery <sup>3</sup>	Responsibility for cost
The proposed works (within Schedule 1 of the Order)	Applicant	Applicant
An alternative solution proposed by the highway authority in the same location	Highway authority	Applicant (subject to principles in 3.3.12)

- 3.3.12 As set out in **Table 3.4**, where requested by a local highway authority the Applicant may agree to an alternative solution to the proposed works set out in Schedule 1 of the DCO. If this approach is agreed, the Applicant's contribution to the cost of such works would be limited to the estimated costs of implementing the Schedule 1 proposals, and the Applicant would need to be satisfied that any alternative proposal would be delivered in a timely fashion by the local highway authority concerned. In all cases the final proposal must be approved in writing by the relevant planning authority.
- 3.3.13 If airport-related traffic reaches the implementation threshold at a particular location:
- The proposed works will be implemented by the Applicant (unless otherwise agreed between the Applicant and the relevant highway authority), subject to approval of the local planning authority, at a suitable time to be agreed between the parties based on their overall programme of works; or
  - The agreed contribution to the alternative solution will be made by the Applicant to the relevant highway authority.
- 3.3.14 The mitigation associated with the proposed works will then be considered complete for the associated MT1 location.

## 3.4 Third party off-site car parking

- 3.4.1 Airport sites do not include third party off-site car parking facilities because the traffic associated with these (aside from any vehicles travelling between these facilities and the airport terminal, such as shuttle buses) are outside the airport's control. This traffic – and its forecast growth due to the Proposed Development – is, however, incorporated in the background traffic. It is therefore incorporated into designs associated with MT1.
- 3.4.2 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 will engage with any off-site parking operator if a positive initial response is

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<sup>3</sup> 'Delivery' refers to overall responsibility for planning, design and construction. These responsibilities may be delegated e.g. the Applicant may delegate delivery responsibility to a highway authority, if agreed.

received from the relevant local planning authority, with regard to additional or extended off-site parking facilities.



## 4 MITIGATION TYPE 2 (MT2)

### 4.1 Overview

4.1.1 **Figure 4.1** is a visualisation of the process whereby Steering Group members may make proposals relating to MT2 mitigation and of how decisions on such proposals would be made. Examples of MT2 measures are listed in **Table 4.1**.

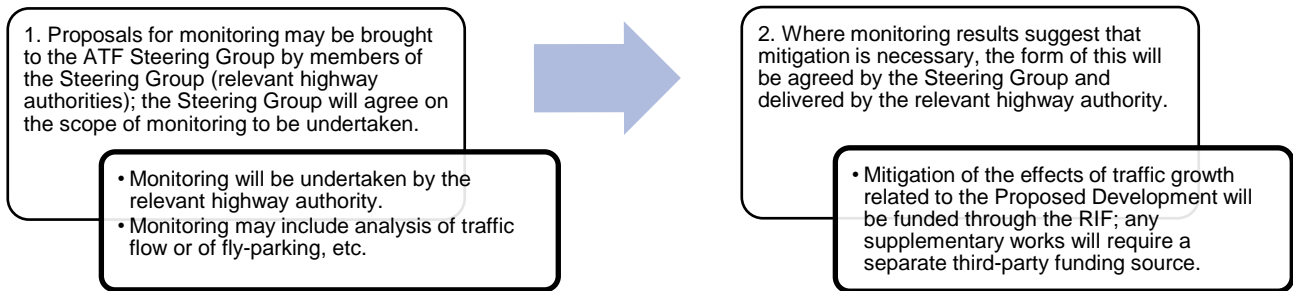


Figure 4.1: MT2 proposal process

Table 4.1: MT2 examples

MT2 example	MT2 example rationale
Junction capacity enhancements	Growth in airport traffic requires enhancements to junction to increase capacity
Traffic calming	Growth in airport traffic requires measures such as chicanes and carriageway narrowing to control the effect of the speed/volume of traffic
Parking controls	Vehicles owned by airport staff/passengers are parked on the public highway and causing a nuisance to users of adjacent properties, requiring the implementation of restrictions on parking

4.1.2 The RIF will be a finite fund for the mitigation of residual airport-related traffic impacts. This fund will be secured in the section 106 agreement. Further details will be provided in the Steering Group Terms of Reference to be contained in the final TRIMMA.

### 4.2 Indicative Principles of MT2 Governance

4.2.1 The indicative principles of management of the RIF, as overseen by the Steering Group, include the following:

- Process for ensuring overall budget control of RIF spending.
- Process for prioritising and agreeing funding allocations (including voting arrangements, where necessary) in the light of investment appraisals.
- Process for decision-making including voting and role of Chair.
- Process for monitoring the effectiveness of measures taken.

4.2.2 The full Terms of Reference for the Steering Group will be provided in final TRIMMA. The final TRIMMA must be substantially in accordance with this

OTRIMMA and be approved in writing by the relevant planning authority, following consultation with the relevant highway authority on matters related to its function. The airport cannot be operated above its extant passenger cap until the TRIMMA has been approved.

4.2.3 **Table 4.2** contains examples of the types of considerations associated with the RIF.

Table 4.2: Example Indicative Principles for the RIF

Example RIF Indicative Principle	Rationale
A maximum allocation per year	To ensure a minimum lifespan of the fund
A maximum allocation per authority	To ensure that all mitigation is not confined to one authority area
Requirement to consider that all works include a commitment to enhance conditions for active travel	Seek that any mitigation benefits people walking and cycling too, in addition to mitigating the effect of traffic increases on highway capacity, where possible

## GLOSSARY AND ABBREVIATIONS

Term	Definition
Undertaker	London Luton Airport Limited, as defined in the Draft <b>Development Consent Order [REP3-003]</b>
Notice to grow	A notice served by the undertaker on the relevant local planning authority under article 44(1) of the DCO
Terms of Reference	The terms by which the TRIMMA will operate, including member organisations and how processes will be undertaken
DCO	Development Consent Order
Proposed Development	The expansion of the airport to 32 mppa
MT1	Mitigation Type 1, which includes proposed offsite highway works contained in Schedule 1 of the DCO
MT2	Mitigation Type 2, which includes residual traffic-related impacts that may arise from the Proposed Development
ML0	Monitoring Level 0, the baseline from which monitored traffic volumes will be compared
ML1	Monitoring Level 1
ML2	Monitoring Level 2
ML3	Monitoring Level 3
TP	Travel Plan, to be written after the 'notice to grow' is served and five-yearly according to the <b>Framework Travel Plan [APP-229]</b>
GCG	Green Controlled Growth. Sets out processes for monitoring and mitigating environmental effects in four environmental topics, including Surface Access, based on defined Limits and Thresholds
Section 106 agreement	Section 106 agreement – please refer to Section 5.8 of the <b>Planning Statement [AS-122]</b> for further information