

**Summary of Representations made at ISH7 submitted by National Highways Limited**  
**Application by London Luton Airport Limited for an Order granting Development Consent for the**  
**London Luton Airport Expansion Project**

**Planning Inspectorate Reference Number: TR020001**

## **1. Welcome, introductions, arrangements for the hearing**

- 1.1 Howard Bassford (Solicitor), Ross Corser (Solicitor) and Jeremy Bloom (Transport Consultant) appeared on behalf of National Highways Limited.

## **2. Transport Modelling in the Transport Assessment**

- 2.1 National Highways echoes the comments made by the Local Highway Authorities in relation to concerns around the Transport Modelling. It is critical to understand the nature of the impact on the local and strategic road networks (and therefore the precise mitigation requirements) that the updated modelling is provided as soon as possible. Please see REP5-092 and REP5-093 for further details. The Applicant has to satisfy the ExA that the issues raised by the interested parties are resolved. Particular concerns are the representation of impacts on the Local Road Network and whether the portrayal of these results in impacts that were they more accurately to be reflected would impact the Strategic Road Network.
- 2.2 National Highways requests sight of the VISSIM model as soon as possible so that the impacts to the M1 J10 can be understood by reference to evidence.

## **3. Sustainable Transport**

- 3.1 N/A

## **4. Framework Travel Plan (FTP)**

- 4.1 National Highways has not had a meeting with the Applicant as has been suggested, in relation to the FTP. This needs to happen as soon as possible. Since the hearing, the parties have sought to make such arrangements.
- 4.2 National Highways shares the confusion demonstrated by the other interested parties in relation to where the mitigation and monitoring framework is secured. At the previous traffic and transport ISH, the Applicant suggested that the Green Controlled Growth (GCG) framework was not the relevant mechanism for mitigating impacts on the strategic road network and that mitigation would flow from the TRIMMA. This is not the position advanced by the Applicant at ISH7. It is noted that the GCG is an innovative approach to mitigating impacts associated with airport growth over time – however the approach to mitigation has to be understood and capable of enforcement through hard controls by affected organisations like National Highways where the change occurs, such that an impact is triggered.
- 4.3 It is also critical that National Highways has a role on the decision making body responsible where a change occurs. Urgent clarity on the structure of the mitigation and monitoring regime is requested of the Applicant.
- 4.4 National Highways would note that given the impact of mode share on traffic volumes, the GCG framework may well important in terms of mitigation of concern to the strategic road network. Accordingly, it ought properly to be involved in a decision-making capacity in relation to GCG.

## **5. Parking**

5.1 N/A

## **6. Off Site Highway Works**

6.1 National Highways requests a commitment from the Applicant that the works will be amended to include provision of a maintenance bay and gantries to assist with wayfinding, now that there is clarity that they can be provided within the redline boundary of the Development Consent Order. At present these items are not part of the works.

6.2 National Highways' approach to the required off site highway works programme has been refined following sight of the emerging forecast for the transport modelling. Discussions around the provision of highway mitigation works to the M1 J10, southbound and northbound slips being tied to specific phases of the airport development, are ongoing.

6.3 National Highways has supplied draft requirements and associated drafting to address this at Deadline 6.

## **7. Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA)**

7.1 National Highways is particularly concerned by the approach to mitigation set out in the TRIMMA. From our review of the TRIMMA, the approach to mitigation is entirely reactive, in that in order to trigger mitigation solutions, it is necessary to pass through monitoring gateways and meet certain pre-agreed thresholds of traffic impact. These thresholds take into account existing baseline traffic levels from 2016. National Highways has two primary concerns with this mechanism. First, the existing baseline traffic levels are not agreed between the parties. The Applicant's position here is that the existing baseline is congested, leading to an assertion that it is National Highways' responsibility to resolve pre-existing congestion to allow the proposed development to proceed. National Highways' position is to neither accept or dispute responsibility for congestion in the existing baseline, but in any event, the Applicant should not add to the congestion unless it is properly addressed. Secondly, by the time any mitigation is required (whether it is under type ML1 or ML2) the impacts to the strategic road network have already crystallised and any mitigation required will not be deliverable for potentially years into the future – during which time the deleterious impact of congestion would continue to worsen.

7.2 Also, the TRIMMA and the GCG have no cross-referencing or inter-relation on their face at all. Given that GCG is concerned with mode share and also includes a serious of mitigation proposals, the overall picture is not consistent. Whilst the Applicant has referred to the surface access strategy, this is not a document that is secured by requirement so far as National Highways is aware.

**8. Construction**

8.1 N/A

**9. Action Points**

9.1 N/A

**10. Any other business**

10.1 N/A

**11. Close of hearing**