



Responses to Issue Specific Hearing (ISH7) Action Points

Application by Luton Rising to extend London
Luton Airport

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1 Introduction

- 1.1 This report provides the response of Luton Borough Council (LBC) as local planning authority (LPA) to the action points arising from Issue Specific Hearing 7 (ISH7).
- 1.2 The response is set out in tabular form identifying the Examining Authority's (ExA) action number, its description and providing the response from LBC to the action.

2 LBC Action Points arising from ISH7 Traffic and Transport

No.	Description	LBC Response
8	Provide details of the Council's bus service enhancement partnership.	<p>In April 2022, the Department for Transport made an indicative funding award of £19.1 million to Luton Borough Council (LBC) in respect of its Bus Service Improvement Plan. This funding is enabling the council and local bus operators to implement a range of improvements to Luton's bus network and associated infrastructure.</p> <p>To utilise the Bus Service Improvement Plan (BSIP) funding, the council has entered into a statutory Enhanced Partnership (EP) with local bus operators. The EP is made by LBC in accordance with Section 138G(1) of the Transport Act 2000.</p> <p>The EP Plan sets out the current state of the network, along with high level BSIP objectives and measures. The EP Scheme sets out detailed commitments and governance arrangements. An EP Board is the decision-making body of the EP. The EP Board comprises LBC officers, one officer from Central Bedfordshire Council and Bedford Borough Council each, and representatives from qualifying bus operators.</p> <p>The EP (now in effect) regards Luton Airport as a major stakeholder. Consequently, the Airport is a member of the EP Stakeholder Forum that supports the Board. This stakeholder group forms part of the second tier of membership and enables key stakeholders to engage with bus operators and influence the Board on the measures and schemes to be implemented.</p> <p>Owing to the fact that sustainable growth of Luton Airport is a recognised ambition of the EP, and Luton Airport is part of the EP Stakeholder Forum, it is proposed that Board continues to act as a mechanism to engage with bus operators and wider industry on priorities and conclusions that have emerged from the DCO's Bus/Coach Connectivity Assessment and emerging transport strategy.</p>

9	Provide further details of any bus services that they think may be missing from the bus and coach study [REP5-058] and why they should be included.	<p>LBC does not believe any services are “missing” and supports all improvements being considered. For context, a response has been included (below) in relation to Table 3.1: Potential bus improvements [REP5-058].</p> <p>Arriva 100: The council is supportive of additional stops and is working on a revised route and frequency calling pattern. An enhanced frequency with limited stops and coverage of villages between the three towns is well supported.</p> <p>Arriva F70: Additional route from the airport bus station to Leighton Buzzard is supported and discussions with Arriva are on-going to realise this. It is understood that these improvements are commercially viable longer-term if ‘kick-start’ funding is provided.</p> <p>Centrebus 230: The council is working with operators to explore potential increases to frequency to the town centre.</p> <p>Stagecoach MK1: The operator has appetite to deliver better frequency and service on this corridor.</p> <p>LBC continues to engage with Luton Airport on issues of public transport through the existing Airport Transport Forum.</p>
12	Provide detail regarding improvements/ new cycle routes in the vicinity of the airport as discussed in the hearing and mentioned in the Road Safety Audits [REP5-005]. Include the locations of the routes and the programme for implementation.	<p>LBC adopted its Local Cycling and Walking Infrastructure Plan (2022-2033) (LCWIP) in 2022. The plan sets out a priority list of cycling and walking routes that will be integrated into the council’s wider plans, policy and decision making.</p> <p>The proposed future network of cycling routes can be found here. The key LCWIP routes that have an interface with the existing airport and proposed expansion are Route J and Route L. A series of cycling and walking improvements along each route have been proposed following audits. All schemes will be subject to consultation and detailed design before they’re delivered.</p> <p>Funding to deliver schemes identified in the LCWIP will come from the council’s capital programme and is expected to utilise Government’s Integrated Transport Block funding in the short-term. Other funding opportunities include government grants and developer funding.</p>

		<p>A detailed delivery programme has not yet been developed as certainty of long-term funding is not guaranteed. Cycling routes have been prioritised based on a range of different factors and public consultation.</p> <p>LBC and the Applicant have worked closely on the design of active travel infrastructure within the vicinity of the airport. This will ensure schemes delivered are consistent with the improvements proposed in the LCWIP.</p>
17	Confirm when Travel Plan for the 19 MPPA Planning Consent is to be submitted to LBC and if it is submitted before the close of the Examination then submit a copy into the Examination.	The updated Travel Plan for the 19mppa planning consent is under development and will cover the period 2024-2028. LBC is working with the airport operator to develop this document and the targets/measures included within it. It is expected that the final Travel Plan will be issued to the council by 20 January 2023. If the document is received during the examination it will be shared with the Examining Authority.
18	Detail potential options to mitigate the fly parking issue in the Luton area including exploration of whether a Controlled Parking Zone could be progressed/ would be viable including exploration of how these measures could be funded without any cost to residents.	<p>The highway authority has a consultation on parking for the Wigmore ward on its works programme for 2024/25. Following discussion with the Applicant, the Applicant has agreed to fund the consultation. The consultation will include options on parking controls intended to prevent airport related fly parking.</p> <p>One of the options being the introduction of a Controlled Parking Zone (CPZ) with residents parking permits. It has also been agreed that any parking controls introduced as a result of the consultation will be funded by the applicant, including the TRO costs and any required lining and signing. The Council's policy is that parking permits are funded by the permit holder. Consequently any permits introduced as part of a potential CPZ in Wigmore (or anywhere nearby) would be paid for by permit holders. It should be possible to provide more detail on the possible parking controls to be offered by the end of the examination.</p> <p>It should be noted that the Council continues to work with Luton Airport on the development of its Parking Management Strategy 2024-2034. The strategy has identified neighbourhoods in the vicinity of the airport as "key areas of investigation". This strategy is expected to be adopted in 2024. It is anticipated that the Airport Transport Forum and use of the Residual Impact Fund may also be used to implement parking controls over the life of the expansion plans.</p>

25	<p>Provide detail of the review undertaken of the proposed highway works to Crawley Green Road/ Wigmore Lane and Eaton Green Road. Include explanation as to why the Council is satisfied that works of this scale would be required to mitigate airport related traffic.</p>	<p>Initial mitigation proposals were shared with LBC in 2019. These proposals were developed in response to VISSIM modelling that was undertaken. Model outputs that justify the highway works were shared in a series of meetings that ran through 2019-2022 as part of engagement with Luton Council.</p> <p>These discussions included reviewing development assumptions, modelling scenarios, coding of the highway network/layout, driving behaviour, modelling convergence, analysis of the two scenarios, network performance, journey times, and level of service and flow paths.</p> <p>In response, LBC has provided feedback, iteratively, on the design of highway schemes proposed as part of the DCO. With respect to Crawley Green Road / Wigmore Lane and Eaton Green Road, the council is satisfied that the mitigation is proportionate to reflect latent/induced demand for these links and junctions generated by airport development. It is worth noting that highway mitigation proposed along these roads also takes account of traffic displacement and congestion that would otherwise occur on other parts of the local road network if the capacity enhancements on these sections of the highway are not delivered.</p> <p>It should be noted, that the final form of solution may differ from the outline designs included in Schedule 1 of the DCO. The OTRIMMA makes it clear that where requested by the highway authority (and approved by the respective planning authority) the applicant may agree to an alternative form of mitigation in the same location. This approach appropriately accounts for any divergences between predicated and actual network flow that occur over the life of the expansion and allows the highway authority to 'adjust down' the scale of works if necessary.</p>
27	<p>Explain whether or not Local Plan Policy LLP6 applies to the current application and the reasons why.</p>	<p>Policy LLP6 relates to the Luton Airport Strategic Allocation. The allocation covers not only the airport, but also airport related parking, Wigmore Valley Park and Century Park. In relation to airport expansion, the policy records that proposals will be assessed against policies in the Local Plan as a whole, with development proposals only supported where they, inter alia, are: directly related to airport use; accord with an up to date Airport Master Plan; incorporate sustainable transportation measures and suitable road access.</p>

		<p>LBC has previously commented upon elements of this policy in our representations (for instance [REP1A-004] and PED.1.2 [REP4-187]), noting that the policy is relevant, but that the plan period is only up to 2031, whilst the DCO envisages development up to 2043.</p> <p>In relation to traffic and transport, the relevant elements of Policy LLP6B are (iv), (viii) and (ix).</p> <p>LLP6B(iv) requires proposals for expansion of the airport to “fully assess the impacts of any increase in air transport movements on surrounding occupiers...and identify appropriate forms of mitigation in the event serious adverse effects are identified.” Such effects are assessed in the Environmental Statement, including proposed mitigation.</p> <p>LLP6B(viii) details that expansion proposals should “incorporate sustainable transportation and surface access measures in particular which minimise use of the private car, maximise the use of sustainable transport modes and seek to meet modal shift targets, all in accordance with the London Luton Airport Surface Access Strategy.” The Airport Surface Access Strategy (ASAS) is prepared every five years, and the ASAS at the time of the adoption of the Local Plan (2017) has been superseded by the current ASAS (2018-2022), with a new ASAS (2023-2028) due for publication. Documentation submitted with the DCO application, such as the Transport Assessment [APP-203], the Framework Travel Plan [REP4-044] and Green Controlled Growth [REP5-020 and REP5-022] assess the impact of the proposed development on surface access arrangements and propose measures to maximise the use of sustainable transport modes, with targets for the various phases. The ASAS will be updated every five years by the Airport Operator during the Proposed Development.</p> <p>Finally, Policy LLP6B(ix) requires development proposals for the expansion of the airport to “incorporate suitable road access for vehicles including any necessary improvements required as a result of the development.” The Transport Assessment [APP-203] has identified the demand for surface access trips associated with the Proposed Development, and off-site mitigation that will be</p>
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		required to provide additional capacity during the three phases of development, and consequently accords with the requirements of this policy.
28	Provide comments on outline TRIMMA.	<p>LBC is supportive of the OTRIMMA as the basis for the future Transport Related Impacts Monitoring and Mitigation Approach. The Council supports the way in which the TRIMMA acts as an agile mechanism for identifying and addressing traffic-related impact.</p> <p>LBC agree that the proposed governance of the TRIMMA will take the form of a subgroup of the ATF. The Council is supportive of the two types of mitigation suggested (MT1) and (MT2). LBC awaits the terms of reference that will be included in the final TRIMMA, to indicate the level of resource required to staff the subgroup.</p> <p>LBC supports the processes associated with mitigation proposed in the application for development consent (MT1) and processes associated with mitigation of other impacts (MT2).</p> <p>The Council support the principle of the Residual Impact Fund. LBC awaits details on the total indicative value of this funding and how it plans to be distributed.</p>
32	Check whether the monitoring approach detailed in the outline Construction Traffic Management Plan (CTMP) [APP-130] is the same as that used for Project Curium. If different provide detail of the differences.	<p>The monitoring approach identified in the outline Construction Traffic Management Plan (CTMP) [APP-130] does differ from that associated with the monitoring associated with Project Curium.</p> <p>The CTMP monitoring approach proposes regular reviews against a list of indicators, namely:</p> <ul style="list-style-type: none"> • Total numbers of vehicle movements in set periods; • Type of vehicle movements; • Distance travelled; and • Effectiveness of logistic management. <p>The CTMP then notes that the results of this monitoring exercise would be combined with the monitoring of the Construction Workers Travel Plan in order to gain an overview of the impact of construction traffic arising from the Proposed Development.</p>

		<p>Project Curium had a Construction Environmental Management Plan (CEMP) which included, inter alia, details about lorry routing and traffic management. The CEMP did not spell out a list of indicators, such as that proposed for the DCO CTMP, rather it restricted site access to the A505 and A1081, prohibited HGV movements on the adjoining residential roads, required 'just in time' deliveries and closely controlled construction traffic entering and leaving the site.</p> <p>The Project Curium monitoring review within the CEMP entailed weekly site meetings with project managers and the principal contractor. These meetings fed in to the monthly Curium risk management meeting. Information gathered in connection with the monitoring of the Construction Workers Travel Plan also fed in to the CEMP (thus for instance the Travel Plan Coordinator analysed staff travel work patterns on a bi-annual basis, in order to determine if targets were being met and to implement more incentives to encourage the use of more sustainable travel modes).</p>
34	Relevant Highway Authorities to provide a list of the roads that they consider should not be used for construction vehicles.	<p>The highway authority considers that construction traffic for the airport expansion will use the following routes in Luton in accordance with the draft Outline Construction Traffic Management Plan submitted by the applicant [APP-130]:</p> <p>A1081 Airport Way Percival Way A505 Vauxhall Way A505 Stopsley Way A505 Hitchin Road Eaton Green Road</p> <p>In that respect construction traffic should not use any other roads in the Borough of Luton.</p>
36	In relation to AP36 - Check whether a similar figure of 60% for construction workers was used for Project Curium.	<p>There was not a similar figure of 60% for construction workers used for Project Curium.</p> <p>The Section 106 Agreement (dated 18 June 2014) associated with the planning permission for Project Curium (LBC ref: 12/01400/FUL) required a Construction Travel Plan to be submitted (Schedule 2, section 3.1).</p>

		<p>The Construction Travel Plan related to journey patterns by construction-related staff and sought to improve site accessibility, reduce travel costs, improve health and wellbeing and minimise carbon associated with transport. The Construction Travel Plan contained five objectives:</p> <ul style="list-style-type: none"> • to set out measures that will enable the appointed contractors to meet the target car/employee ratio as pre-agreed • to enhance corporate social responsibility and environmental image • to promote the benefits of sustainable modes of transport • to reduce unnecessary travel; and • to ensure that all staff are aware of the Construction Travel Plan and the most efficient modes of transport. <p>With regard to the first objective, that related to car-pooling, and set a target of 20% of construction workers' journeys to be made by car-pooling. In relation to the third objective, the target was for 30% of construction workers journeys to be made either by car-pooling, public transport, cycling or other sustainable modes of transport.</p> <p>The Construction Travel Plan worked in conjunction with the Construction Environmental Management Plan (CEMP), which sought to minimise the designated areas for contractors parking and through the induction process encouraging construction staff to use public transport, car-pooling and other sustainable modes of travel.</p>
38	Confirm whether there were any traffic and transport related issues experienced during the Project Curium construction works.	<p>Project Curium involved a number of improvements in order to facilitate the increase in passenger numbers to 18mppa. Simply summarised the main elements entailed:</p> <ul style="list-style-type: none"> • Road improvements: dualling the access road to the airport from the Holiday Inn roundabout to the core terminal area (CTA), including internal circulation areas; • Public transport hub improvements: rearrangement of the bus stops to provide 18 dedicated bus parking bays, reducing pedestrian and bus conflicts;

		<ul style="list-style-type: none"> • Car parking improvements: increased parking provision in the long-term car park, alterations to the mid-term car park and the provision of a multi-storey car park; • Terminal improvements: increased space to provide additional capacity within the main terminal (baggage, security, immigration, departures and retail) and enhancement of the appearance: • Pier B: a new pier for aircraft to assist with passengers embarking and disembarking from aircraft; and • Aircraft manoeuvring and parking: new taxiway, extensions to taxiway parallel to the runway, rationalisation and provision of additional aprons for aircraft parking <p>There were no reported traffic and transport related issues arising during the construction works, which predominantly occurred between 2015 and 2018, with the airport operator taking steps to limit disturbance to the highway network as it was in their interest to ensure that passenger could arrive in a timely manner for their flights.</p>
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