

Bridlepaths, Footpaths, Public Rights of Way (PROW).

When reading the related application documents, SLAE have had to make a number of assumptions, as a result of inconsistencies throughout the documents. For example,

- FP = Footpath,
- Path numbering is not consistent throughout the application documents, such as 06 is assumed to be 006
- An unmarked footpath might also mean a public footpath, a shared footpath, and off-road shared footpath?
- That an informal or undesignated footpath is the same as a desire path? A desire path is a path or a track made over time by the wishes & feet of walkers or animal traffic, especially those paths that run contrary to design or planning and represent the paths people would naturally follow (often known as 'desire lines'), to encourage people to stay on them.

7 examples of some desire paths.



1. Eaton Green Road, OS Grid Ref: TL 12183 22208



2. Eaton Green Road, OS Grid Ref: TL 12288 22226



3. Eaton Green Road, OS Grid Ref: TL 12790 22259



4. Eaton Green Road, OS Grid Ref: TL 12946 22232



5. Darley Lane, OS Grid Ref: TL 13385 22349



6. Darley lane (opp Olivers), OS Grid Ref: TL 13456 22358



7. Winch Hill, OS Grid Ref: TL 13714 22112



SLAE have found no references to pedestrian crossings on Eaton Green Road, Darley lane or Winch Hill when the application reaches the implantation phase two and road traffic is forecasted to reach peak volumes, however there is plenty of road traffic crossing evidence at junctions that is related to

terminal and the Airport Access Road. This suggests that pedestrian access to the park is not a priority to Luton Rising.

000803-5.05 Environmental Statement Appendix 1.1 Scoping Report (Volume 1).pdf

15.5.25 Neighbourhood quality is determined by the character and attractiveness of the public realm within a neighbourhood, including streets, footpaths, public squares, parks and playing fields. It does not include residential or other private property. Noticeable changes in two or more of the following environmental factors may lead to a neighbourhood quality effect: traffic, noise, air quality, landscape and visual impacts. When these factors are altered, people's levels of satisfaction with their living environment may change, which in turn may affect their wellbeing. This may affect people's enjoyment of outside space and 'sense of place', including feelings of attachment to, and pride in, their neighbourhood.

SLAE Comment.

A true statement as evidenced by the number of Relevant Representations and subsequent Written Representations that mention Wigmore Valley Park and the surrounding outdoor space.

000810-5.10 Strategic Landscape Masterplan.pdf

SLAE Comment.

SLAE ask for clarification on the thin white lines as shown on the Paths & Public Rights of Way map, on page 17? Are these desire paths or contour lines?

On the same map, the new and improved entrances to the replacement Open space (D on the Paths & Public Rights of Way map as shown may attract airport related car parking as identified in the Written Representation, 'Wigmore Valley Park' **001102-5.01 Environmental Statement Chapter 4 The Proposed Development Revision 1.pdf 4.10 Work Type – Highways,** “

SLAE note that will be insufficient car parking provision around the new areas or / country lanes around Wigmore Valley Park and cannot find any mention of the issues that will be caused or what will be done to alleviate these in the future. For example, Uber cars already park on the pavement and grass areas leading to Wigmore Valley Park waiting for a possible fare to book a lift via the Uber app system. This will spread onto roads surrounding the park such as Eaton Green Valley Road, Darley Lane and Winch Hill along with the lanes leading to Tea Green. Uber cars and similar park in / on any available space within ten minutes of the airport pick up to be able to react to requests.

000817-7.02 Transport Assessment - Part 2 of 4 (Chapters 5-8).pdf

Pedestrian facilities

5.4.15 Pedestrian facilities are provided within the airport to meet operational needs. Under the current arrangements, within the terminal area, all pedestrian routes are fully accessible, with dropped kerbs and tactile paving. Zebra crossings are provided at busier locations, and there is lighting throughout the area. Footways and crossings are also provided on Airport Way, Percival Way,

President Way and Frank Lester Way as well as other roads within the estate, which link into the wider pedestrian network in Luton.

There are also several Public Rights of Ways (PROWs) located within the airport, including:

- a. Public bridleway Kings Walden 052, which connects between Coleman's Road (near Breachwood Green) and Eaton Green Road, and partially serves as a section of the Chiltern Way long distance footpath*
- b. Public footpath Kings Walden 041, which borders Darley Road and Eaton Green Road, and also partially serves as a section of the Chiltern Way long distance footpath*
- c. Public footpath Kings Walden 043, which crosses the ridgeline of Winch Hill and connects between Eaton Green Road and Winch Hill Road*
- d. Luton Borough public footpaths FP29 and FP38, and Luton Borough bridleways BW28 and BW37, which follow the mature hedgerow to the south east of Wigmore Valley Park and east of the airport between Eaton Green Road and Winch Hill Road*

5.4.16 The PROW routes in the immediate vicinity of the airport are shown on Figure 5.10.

SLAE Comment.

Assumption is that the 'estate' means the 'Proposed Development Boundary'. Similarly, the statement that "There are also several Public Rights of Ways (PROWs) located within the airport", is not correct as these PROW's are not located within the airport, but are in the 'Proposed Development Boundary'. In fact, this statement contradicts the paragraph in bullet point d.

000937-5.01-Environmental-Statement-Chapter-8-Biodiversity-Revision-1.pdf

Assessment Phase 1

8.9.88 The operation of the provision of open space will introduce additional recreational pressures into the retained area that supports orchid populations. Such pressures may include trampling and a change in soil pH due to nitrification through dog urine. The orchids are located within what is currently an area of set-aside on the southern edge of an arable field to the south of Wandon End. An existing public right of way runs through this area, however the footfall will increase once the provision of open space is established. The provision of open space has been designed to include defined footpaths and signage to channel the public away from sensitive retained habitats, and this will reduce the impact on the orchid population, however it is anticipated that an impact will remain.

SLAE Comment.

Will defined footpaths and signage discourage Desire paths? Has this been considered in the design, particularly as Desire paths exist in this area? Surely defined footpaths should be built where desire paths currently exist?

Badger

All assessment Phases

8.11.42 The provision of open space has been designed with defined footpaths to try to direct people away from retained habitats (Badger Mitigation Strategy, Appendix 8.7 of this ES

[TRO20001/APP/5.02]). These measures will help to reduce disturbance impacts on badgers utilising the adjacent habitats. The Habitat Creation Area will not be subject to the same recreational pressure. The disturbance to badger foraging habitats and setts, as a result of the operation of all assessment phases of the Proposed Development, represents a permanent adverse impact, of very low magnitude, on this low value receptor. This equates to a residual negligible effect, which is not significant.

SLAE Comment.

Will defined footpaths and signage discourage desire paths? Has this been considered in the design?

001530-London Luton Airport Limited - Comments on Relevant Representations (RR) 5 (Affected Persons).pdf

SLAE Comment.

SLAE note that LR will compulsorily purchase hedges and the ability to impose restrictive covenants to secure the retention and maintenance of new hedge planting if landlords do not play ball. This appears to be overkill and is outside the 'Proposed Development Boundary' though within the 'Order Limits'. Confused why? Is this to safeguard future possible development beyond the DCO?

001898-8.53-Applicant-post-hearing-submission-CAH1.pdf

7.1.6 The Applicant clarified that the proposed replacement land has been managed for a number of years to reduce historic nutrient levels resulting from farming. The Applicant agreed to look into any potential existing informal use of the land by members of the public, noting that the land is crossed by formal public rights of way.

SLAE Comment.

SLAE do not agree that the land has been managed for a number of years, in September of 2021 SLAE informed Luton Rising of litter and fly tipped rubbish that had laid on LR / LBC owned land for months prior. SLAE used the litter reporting tool 'Love Clean Streets' to report the rubbish to LBC multiple times, who ignored the reports, as the tool could not identify the difference between the council and the landowner. In fact, In November 2021 LR arranged for SLAE to go out with Accuro Environmental to show them the places on LR land where the litter and fly tipped rubbish was. If the land had been managed there would have been no need for this. Accuro informed SLAE that LR had asked them to perform monthly patrols of the LR land, which since that time has now changed to two monthly visits. If the land was managed, then SLAE would not have had to struggle to make LBC take action and LR to set up site visits. SLAE can submit email evidence to validate all statements made in this paragraph.