

LONDON LUTON AIRPORT EXPANSION DEVELOPMENT CONSENT ORDER APPLICATION

ISH ON ENVIRONMENTAL MATTERS (ISH7) TRAFFIC AND TRANSPORT INCLUDING SURFACE ACCESS ON 28 NOVEMBER 2023

Tuesday 28th November 2023

POST HEARING SUBMISSIONS

Fiona Ross (Pinsent Masons) and Stephanie Biggs (WSP – traffic and transport) and Edward Leigh (Senior Transport Policy Officer at North Herts Council) attended in person and Christine Elphicke (WSP – transport modelling) attended virtually.

Representing Hertfordshire County Council, North Hertfordshire District Council and Dacorum Borough Council

1. INTRODUCTION

- 1.1 This document sets out the post hearing submissions and summarises the oral submissions made jointly by (together, “**the Hertfordshire Host Authorities**”) at Issue Specific Hearing 7 (“**ISH7**”) held on 28 November 2023 in relation to Luton Rising’s (“**the Applicant**”) application for development consent for the London Luton Airport Expansion Project (the “**Project**”).
- 1.2 ISH7 was attended by the Examining Authority (the “**ExA**”), the Applicant, the Hertfordshire Host Authorities, together with a number of other Interested Parties.
- 1.3 Where the ExA requested additional information from the Hertfordshire Host Authorities on particular matters, or the Hertfordshire Host Authorities undertook to provide additional information during the hearing, the Hertfordshire Host Authorities’ response is set out in this document.
- 1.4 This document does not purport to summarise the oral submissions of parties other than the Hertfordshire Host Authorities, and summaries of submissions made by other parties are only included where necessary in order to give context to the Hertfordshire Host Authorities’ submissions in response.
- 1.5 The structure of this document generally follows the order of items as they were dealt with at ISH7 set out against the detailed agenda items published by the ExA on 14 November 2023 (the “**Agenda**”).

2. **SUMMARY OF ORAL SUBMISSIONS MADE**

Relevant PINS' Agenda Item	Proposed Response
2. Transport Modelling in the Transport Assessment	
<p>Applicant to provide a brief update regarding the transport modelling in line with Department for Transport guidance including how any outstanding concerns raised by the relevant highway authorities in relation to the transport model are being progressed and resolved</p>	<p>Christine Elphicke of WSP, for the Hertfordshire Host Authorities, explained that there remain a number of outstanding concerns raised by the relevant highway authorities and on which they have been engaging with the Applicant. A meeting with the Applicant was held on 12th October in relation to the Covid analysis undertaken.</p> <p>The Applicant in their trip distribution plans in REP4-048 and REP5-037 TR020001-002183-8.30 Trip Distribution Plans and in results presented in all Technical Notes and reports we have received are still not providing figures which clearly show the volumes of traffic on all links and it is impossible to see the traffic flow differences between the scenarios presented. The Hertfordshire Host Authorities would request that this is resolved as soon as possible.</p> <p>Confirmation is also required from the Applicant as to whether the trip distribution patterns of trips are likely to extend further east as a result of the airport expansion.</p> <p>The Applicant has provided an update within the following documents received at Deadline 4:</p> <ul style="list-style-type: none"> • REP4-086: Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 1 • REP4-106: Applicant's response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 2 Risk Assessment <p>The Hertfordshire Host Authorities have raised a number of questions relating to these documents within REP5-068 submitted at Deadline 5.</p> <p>The Hertfordshire Host Authorities requested in their response to REP4-086 (see REP5-068) that the Applicant should provide more information of the trends by different vehicle types, cars, Light Goods Vehicle's (LGV's) and Heavy Goods Vehicle's (HGV's), between 2016 and 2023 where available.</p> <p>The Applicant has also used observed counts from a smaller area around Luton Airport and not the whole modelled area.</p> <p>The Hertfordshire Host Authorities requested in REP5-068 that the Applicant provide some commentary on the changes in bus use in the study area between 2016 and 2023. The use of public transport post-Covid will</p>

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	<p>affect the mode share of trips which could results in greater highway traffic. The Applicant should provide the evidence to show that no changes in baseline and future mode choice are justifiable.</p> <p>The Hertfordshire Host Authorities requested in REP5-86 that the Applicant should clarify how the 2023 forecast year has been developed.</p> <p>REP4-086 and REP4-106 provide evidence of reduced traffic flows on the local road network between 2016 and 2023. However, the Applicant has not undertaken any adjustments to the base year model in line with DfT TAG Guidance M4. This therefore risks overestimating the base year vehicles on the local road network which is likely to impact the future year routing of traffic from Luton airport. More information on other local roads were requested by the Hertfordshire Host Authorities in REP5-068 TR020001-002382-submissions received by Deadline 4.</p> <p>The Applicant has proposed not to make adjustments to base and future year models but this was not agreed with the Hertfordshire Host Authorities at the meeting on 12th October as the Hertfordshire Host Authorities did not have the required technical information to enable them to agree this, and there has been no formal agreement of this approach.</p> <p>The Hertfordshire Host Authorities accept that CAA data use is acceptable for this study albeit, it has a small sample size. However, it would be useful for the Applicant to provide a comparison with the CAA data used and the post Covid 2022/23 CAA data now available.</p> <p>The Hertfordshire Host Authorities note that Buckinghamshire County Council and National Highways indicated that they generally echoed the concerns raised by the Hertfordshire Host Authorities in relation to this agenda item.</p> <p>Edward Leigh Senior Transport Policy Officer at North Herts Council stated that there has been a focus on motor traffic modelling. However, as noted in the PADSS [REP2-058], the geographic distribution of all trips by all modes is needed to build a complete picture of sustainable mode shares, as percentages and absolute numbers, for trips through North Hertfordshire (and other neighbouring authorities), and hence how the applicant has derived the motor vehicle trip numbers that are inputs to the motor traffic modelling. The Hertfordshire Host Authorities have not seen this information yet – the applicant has provided only percentage mode shares for all trips to the airport and (motor) traffic flow diagrams. Without this information, it is not possible for the Hertfordshire Host Authorities to fully assess the Surface Access Strategy; whether the measures to support sustainable travel are credible; what will need to be funded from the STF; and if the forecast funding from the STF will be adequate. At a minimum, the Hertfordshire Host Authorities request that the absolute figures for trips – staff, passenger and other – by each mode from different origins is provided</p>

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	by the Applicant, so that it is absolutely clear, for instance, how many additional trips the airport expansion will generate, by car, bus and coach, through North Hertfordshire.
Forecast infrastructure assumptions	<p>No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.</p> <p><u>Post hearing note:</u></p> <p><i>These are now in line with the Hertfordshire Host Authorities expectations.</i></p>
3.Sustainable Transport	
Applicant to provide update on the engagement with bus and coach operators and how that supports the Applicant's Bus and Coach Study [REP5-058] submitted at Deadline (D) 5	<p>Stephanie Biggs of WSP, for the Hertfordshire Host Authorities, explained that in terms of engagement regarding the bus and coach surface access, the Hertfordshire Host Authorities have submitted details to the Applicant's consultant of the bus/coach enhancements that they would like to be included in the airport expansion surface access strategy and have highlighted the need for pump-priming of these services to make a meaningful impact on mode share and behavioural change for trips through Hertfordshire and from the east.</p> <p>In relation to the content of the Bus and Coach Study [REP5-058], this does not change the Hertfordshire Host Authorities overall stance in relation to bus and coach travel and the need for financial support and implementation of new or improved bus or coach services up front and immediately following the current planning permissions.</p> <p><u>Post hearing note and Action Point 9 to provide further details of any bus services that Hertfordshire think may be missing:</u></p> <p><i>The bus and coach study identifies, appraises, and prioritises a series of potential routes including prioritising the Hitchin and Stevenage route (route 100). It is a prioritisation exercise, but Appendix B does not show how all the services have been assessed, there are some obvious gaps in existing provision and issues with timings of services which could be resolved to improve use by staff or passengers. It is hard to understand weighting and how that has been worked through to the conclusions.</i></p> <p><i>Existing and route aspirations have been omitted from the strategy:</i></p> <ul style="list-style-type: none"> • <i>788 National Express route, which is the only coach service to call in Hitchin and which was omitted from the Bus and Coach Study.</i>

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	<ul style="list-style-type: none"> • <i>The aspiration in the adopted South West Herts Growth and Transport Plan is for an M1 express coach service between Luton and Hemel Hempstead (Package SM10). However, this is not picked up. None of the new bus/coach services in Table 3.2 provides links to Hemel.</i> • <i>There is a lack of bus provision between Luton and Welwyn Garden City / Hatfield and also Hemel Hempstead, which would be unlikely to be commercially viable from the outset but would offer good connections to assist with achieving mode share targets from the east of London Luton Airport.</i> • <i>North Herts Council has asked the Applicant to design a bus and/or coach service that would serve Hitchin railway station to provide faster and more convenient connections for those travelling to/from north-east of Luton (see [REP5-058]).</i> <p><i>Neither the Bus and Coach Study nor the Framework Travel Plan makes a clear distinction between funding and other commitments the applicant will make to enhance, support and promote bus and coach services as part of its development plan (i.e. to make the development acceptable in planning terms and to keep operational impacts within the GCG Threshold 1), and what will be left to the discretion of the ATF in how it deploys the STF to attempt to meet Travel Plan targets agreed post DCO. For reference, paragraph 1.3.1 of the Bus and Coach Study states (emphasis added): "Improvements in bus and coach services would contribute to achieving the mode share Limits outlined in the Green Controlled Growth Framework [APP-218, now REP5-022] and the mode share Targets to be set in future TPs.". The Study conclusions make bold statements (e.g. in paragraph 5.1.6) that the prioritised improvements will help Preston, Letchworth and Welwyn. However, it is hard to see how this is possible given the improvements set out in Table 3.1 and the Hertfordshire Host Authorities need a better understanding of this.</i></p> <p><i>In addition to the above, existing service data is out-of-date as follows:</i></p> <p><i>From Luton Airport Parkway Station:</i></p> <ul style="list-style-type: none"> • <i>Centrebus 366 is now demoted to operate as a school-time only service so importance has reduced.</i> <p><i>From Luton Town Centre:</i></p> <ul style="list-style-type: none"> • <i>No mention of Uno services 610 and X10 from Luton Interchange to Hatfield. These are both frequent services - better than every 30 minutes combined.</i> • <i>No mention of Centrebus 46, hourly between Luton Interchange and Hemel Hempstead via Redbourn and Markyale.</i> • <i>No mention of Red Eagle service 88 between Luton Interchange and Hitchin via Preston.</i>

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	<ul style="list-style-type: none"> • <i>721 limited stop service that operates between Luton Interchange, Harpenden, St Albans and Hemel Hempstead needs including.</i> <p><i>With the low level of forecast rail travel from the Hertfordshire stations (3% has been quoted from St Albans/Harpenden [REP4-103]) and the lack of confirmed provision for new/enhanced bus and coach services from the east, it is difficult to understand how the proposed mode share targets for rail and bus/coach will be achieved to support the airport growth. This raises concerns with the Hertfordshire Host Authorities that the assumption for travel to the airport from the east is still mainly reliant on private car travel and that there are inadequately effective proposals to change this.</i></p> <p><i>The Hertfordshire Host Authorities consider that a proactive approach to pump prime services is required, so that there are realistic travel opportunities by bus and coach from the east, immediately following the current planning permissions and from the start of the expansion associated with the DCO.</i></p>
Cycling and walking	<p>Stephanie Biggs (WSP) for the Hertfordshire Host Authorities explained that the St Albans LCWIP identifies the need for segregated cycling provision between Harpenden and Luton along the A1081 corridor and the need for improvements to surfacing and lighting on the Luton – Harpenden Greenway and making access points barrier free and step free to make it accessible for year-round commuting.</p> <p><u>Post hearing note:</u></p> <p><i>Harpenden to Luton is also identified as a key prioritised route in England's Economic Heartlands (EEH) Active Travel Strategy.</i></p> <p><i>Ensuring good links with the Luton DART station from Harpenden and enhancements to this route would contribute to mode share targets and travel from the east. There should be improvements in links from the existing cycle infrastructure to the Parkway DART station and secure cycle parking for staff provided or confirmation provided that staff would be able to take bikes free of charge on the DART.</i></p>
Applicant to provide a summary regarding the Sustainable Transport Fund [REP5-056]	<p>Stephanie Biggs (WSP) for the Hertfordshire Host Authorities noted that Para 3.3.10 of REP5-056 refers to comments on the sufficiency of the fund in the early years to enable investment in new bus routes and effect behaviour change investment (subject to route viability analysis), stating “The feasibility of this approach is under consideration”. The Hertfordshire Host Authorities consider that funding in the early years is essential.</p> <p>REP5-056 identifies the level of the fund that could be available, but it does not identify a potential cost associated with the FTP Toolkit of improvements, so it is still unclear whether the fund will be sufficient to implement the sustainable measures over time, whether it is ambitious enough in total and whether it is</p>

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	<p>providing sufficient measures in total to effect the behaviour change that is needed to support the airport growth and increased catchment from the east. Without knowing the cost associated with the Toolbox of potential measures it is not possible to know whether the STF value will be sufficient and how much funding would be available to spend across the six priority areas. The Hertfordshire Host Authorities also note that the fund is dependent on levies from airport parking, and there may therefore be a shortfall if levels of airport parking are less than anticipated. Clarity is needed on other sources of funding should this be the case.</p> <p>It is also not clear how the fund will be fairly allocated across the competing modes and geographic spread. The STF is competitive across the six surface access priority areas and across the region, which could result in some authorities across the region not getting any of the funding.</p> <p>The Residual Impacts Fund (RIF) allocates funds geographically, so there is more certainty around the fund available for the authorities. The Hertfordshire Host Authorities request more certainty about the value available to each of the authorities.</p> <p>Based on REP5-056 the Hertfordshire Host Authorities understood that the STF parking levy is proposed to stop when the airport reaches 32mppa, notwithstanding that the monitoring has been extended to 5- years post completion. The Hertfordshire Host Authorities consider that the STF should be available for at least the same timescale or longer. The fund capping proposals suggest that when the airport reaches maximum capacity there will be minimum/ no investment in sustainable transport required. The Hertfordshire Host Authorities queried why the fund could not be retained in perpetuity, noting that it is funded through the parking levy.</p> <p>The Applicant indicated that it is not the intention for the STF to cease when the airport reaches 32 mppa, and that this would instead represent an appropriate time to review how the STF is structured. However, the Hertfordshire Host Authorities note that there is nothing to secure this, and that under proposals set out in REP5-056 the STF would cease when the airport reaches 32mppa. The Hertfordshire Host Authorities request that the Applicant confirms how the retention of the STF after this date will be secured in the DCO.</p> <p>The Applicant also stated that the FTP will require more ambitious targets to be set in the first (and future) Travel Plans to be agreed with the Hertfordshire Host Authorities than are set out in the Limit in relation to surface access in the GCG Framework. However, the Hertfordshire Host Authorities note that this is not currently secured in the relevant documents. The Hertfordshire Host Authorities request that the Applicant confirms how the setting of such more ambitious mode share targets will be secured in the DCO.</p>

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	Edward Leigh Senior Transport Policy Officer at North Herts Council echoed the comments that the incentive to use sustainable transport in the form of the 25p levy on airport parking should continue in perpetuity.
4.Framework Travel Plan (FTP)	
Applicant to provide a brief update in relation to the FTP [REP4-044]	Stephanie Biggs (WSP) for the Hertfordshire Host Authorities did not make any comment during the hearing as the points for the Hertfordshire Host Authorities had already been made under earlier agenda item on the STF.
5.Parking	
'Fly-parking' – Applicant to provide update on work done since the last hearing regarding this issue including a summary of engagement with the relevant highway authorities	<p>Stephanie Biggs (WSP) for the Hertfordshire host Authorities noted that the Hertfordshire Host Authorities' current position in relation to off-site car parking links to the monitoring of the trips associated with them. The Examining Authority noted that this could be picked up in the later agenda item regarding the TRIMMA.</p> <p>Those trips are currently being missed out in the TRIMMA monitoring, but they will be additional traffic associated with the airport expansion. It is understood that an increase in the privately operated off-site car parking has been accounted for in the modelling and assumptions have been made about the provision expanding. But there is nothing in the TRIMMA to account for these trips on the highway network:</p> <ol style="list-style-type: none"> 1) There will be a finite amount of on-site parking at London Luton Airport but traffic levels and patterns will also be affected by the Airport growth within the wider network due to the off-site car parking provision. 2) The traffic related to the offsite London Luton Airport car parks (existing and future) needs to be accounted for in the airport traffic monitoring to get a clear view of the off-site impacts of the airport growth. Any changes associated with traffic travelling to/from the off-site car parks will be a direct result of London Luton Airport and expansion of them will be directly related to the interventions that the Applicant is implementing with the Airport site itself. The proposed monitoring at the MT1 sites will miss trips that are on the network related to London Luton Airport but ending at the off-site car parks, this will therefore not be reflective of the actual traffic changes associated with the airport expansion. 3) The Hertfordshire Host Authorities would like to see an updated section in the Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) to address this concern and include traffic monitoring associated with the off-site car parks.

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	<p>Edward Leigh, for North Herts Council confirmed that North Herts Council's area contiguous to Luton Borough is all green belt and/or AONB. Therefore, it would be challenging to secure planning consent for a surface car park in that area. North Herts Council would have concerns if the Applicant were relying on this.</p> <p>Post hearing note and Action Point 30 – North Herts to explain concerns regarding on-going monitoring of off-site car parking:</p> <p><i>The Hertfordshire Host Authorities request clarity on what the Applicant has assumed for growth in provision of off-site parking in absolute numbers (not just percentage growth), noting that Figure 5.13 of the Transport Assessment [REP4-085] lists known off-site car parks, the capacity of which totals 6,800 plus one “unknown” (Pink Pig Parking). Pro-rata growth from 18 to 32mppa implies an additional 5,000+ spaces, though demand will be reduced by GCG, but by an as-yet unspecified amount.</i></p> <p><i>The Hertfordshire Host Authorities also request clarity on what the Applicant has assumed for the baseline quantity of airport parking spaces on privately rented driveways and on-street (‘fly parking’), how this has been assessed, what future growth assumptions the Applicant has made, and how the Applicant proposes to monitor these in future.</i></p>
On-site car parking	No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.
6.Off-Site Highway Works	
Road Safety Audits (RSAs). Applicant to provide a brief update regarding the engagement with relevant Highway Authorities in relation to RSAs [REP5-055]	<p>No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.</p> <p>Post hearing note:</p> <p><i>Hertfordshire County Council Road Safety Audit team will follow the correct process and respond to the RSA.</i></p> <p><i>Overall context for the Hertfordshire Host Authorities, which will be covered later in the agenda on the proposed highway mitigations at the three Hitchin junctions, is that the Hertfordshire Host Authorities have requested [REP2-058] that further design work is undertaken to meet policy requirements at these junctions to ensure acceptable policy compliant mitigations are built into the cost plan to give certainty that enhanced measures could be provided.</i></p>

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Proposed Highway Works to M1 Junction 10	No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.
Proposed Highway Works to three junctions in Hitchin	<p>Stephanie Biggs (WSP) stated that the Hertfordshire Host Authorities' current position is as follows:</p> <ol style="list-style-type: none"> 1) North Herts Council is engaging with the Applicant in ongoing SoCG discussions regarding specific locations where anomalies and inconsistencies have been identified. 2) The Hertfordshire Host Authorities have indicated that the proposed mitigations at the three junctions in Hitchin (Schedule 1 to the DCO) are inappropriate and that alternative mitigations should be developed with the Applicant as part of this planning application. Hertfordshire County Council and North Herts Councils do not agree to the Applicant's proposal to limit the funding for the MT1 schemes to the cost of implementing the currently proposed Schedule 1 mitigations in Hitchin. The proposed Schedule 1 schemes for the three junctions in Hitchin are not compliant with local policy (in particular the Hertfordshire Local Transport Plan which is included as part of the "Deadline 4 Submission – Appendix 1: Response to ExQ1 BCG.1.1 – Development Plan Policies [REP4-127]) and conflict with schemes set out in the North Central Hertfordshire Growth and Transport Plan for the Hitchin Hill (SM47) and Pirton Road (SM48) roundabouts. [REP4-085]. 3) Hertfordshire County Council and North Herts Council are requesting further engagement to develop alternative designs and costings to feed into the DCO and provide certainty that appropriate measures will be implemented. 4) They are inconsistent with the applicant's own "indicative principles" for MT2 mitigations which have a ("Requirement to consider that all works include a commitment to enhance conditions for active travel" – OTRIMMA [REP5-041]). 5) Modelling results in the Transport Assessment for the three Hitchin junctions [REP4-082] raise some concern that in not taking account of the dynamic reassignment of trips in the junction models by not having a strategic model which represents the existing highway network 'with proposed development' it is not possible to understand whether the mitigation proposals are addressing the forecast junction capacity issues because the traffic flow forecasts may not be representative. At the moment the analysis for this scenario uses the CBLTN-LTN Proposed Mitigation 'with proposed

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	<p>development' strategic model runs. In some cases, this is leading to a reduction in traffic flows. It doesn't reflect any Covid-19 Update to the modelling.</p> <p>6) There is no evidence to suggest that the arbitrary value of 15 PCU used in the assessment of the Wratten Road junction is accurate. It would be expected that most of the trips from Wratten Road would be turning right towards Hitchin and therefore opposing the traffic flow on the other approaches. The Applicant should provide details of the turning assumptions used. The Hertfordshire Host Authorities do not consider from the information available that this junction has been modelled appropriately to accurately identify the mitigation scheme and effects and to demonstrate that the 15 PCU traffic flow on Wratten Road is appropriate. A survey is required to verify this assumption.</p> <p>The Hertfordshire Host Authorities requested further information on design and costings regarding these junctions.</p> <p>Edward Leigh for North Herts Council expanded on the reason why this is a principal area of disagreement:</p> <ul style="list-style-type: none"> • The Hertfordshire Local Transport Plan sets the overall approach to transport as follows: "This plan accelerates the transition from a previous transport strategy that was largely car based to a more balanced approach which caters for all forms of transport and seeks to encourage a switch from the private car to sustainable transport (e.g. walking, cycling and passenger transport) wherever possible." • The DfT policy paper (Circular 01/2022), Strategic road network and the delivery of sustainable development (see also Post hearing note below), expresses at a national level this key principle of the Hertfordshire Local Transport Plan: • <i>"15. The Transport Decarbonisation Plan and the Future of Freight Plan also recognise that local planning and highway authorities need help when planning for sustainable transport and developing innovative policies to reduce car dependency. This includes moving away from transport planning based on predicting future demand to provide capacity ('predict and provide') to planning that sets an outcome communities want to achieve and provides the transport solutions to deliver those outcomes (vision-led approaches including 'vision and validate,' 'decide and provide' or 'monitor and manage')."</i> • This is referenced by Active Travel England Standing Advice Note: Active travel and sustainable development (October 2023) in paragraph 1.6.

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	<ul style="list-style-type: none"> • The GCG Framework is a commendable attempt to set a 'vision and validate' approach, but this is abandoned when comes to the Hitchin junctions, where an increase in motor traffic is being predicted and capacity-increasing measures proposed as mitigation (i.e. predict and provide). • The North Central Hertfordshire Growth and Transport Plan sets out the Highway Authority's ambitions for all three junctions the Applicant has identified for interventions. Not only is there a conflict in policy, if (as is likely) the interventions planned by the Highway Authority are delivered first, the interventions proposed by the applicant (which are based on the current road layouts and targeted for Phase 2a of the airport expansion) are likely (owing to land constraints) to be undeliverable even if redesigned.. • North Herts and Hertfordshire Councils would like to co-develop with the Applicant mitigations that are policy- and plan-compliant, and which therefore aim to free up capacity on the local roads network through modal shift, rather than creating additional localised capacity for motor traffic. <p>Edward Leigh continued to note in response to a query from the Examining Authority that that the Hertfordshire Host Authorities have not seen estimated costs for the junction improvements, and stated that in any event these should not be seen as a reference cost cap for alternative interventions as the proposed interventions are not compliant with relevant local policies and plans, and are unlikely to be sufficient. The Hertfordshire Host Authorities are content to agree the precise mitigation required at the appropriate time but do not want this to be tied to a baseline of relatively minor interventions that are not policy compliant.</p> <p>Edward Leigh stated that North Herts Council is not confident that the baseline level of traffic on which the forecasts are based is correct. In any case, the Applicant should be starting with the (all modes) trip demand and not simply vehicular trip demand. He notes that increasing vehicle capacity at junctions will have wider ramifications for Hitchin and surrounding villages and undermine attempts to support sustainable travel in Hitchin. When reiterating the request for the baseline traffic counts, the Applicant responded that the model inputs were from the strategic model.</p> <p>The Hertfordshire Host Authorities welcome further opportunities to engage directly with the Applicant to resolve these points.</p> <p><i>Post hearing note and Action 23 to submit a copy of the Department for Transport policy paper: strategic road network and the delivery of sustainable development:</i></p> <p><i>The Hertfordshire Host Authorities invite the Applicant to propose how it wishes to proceed with developing, designing, modelling and costing policy- and plan-compliant alternative interventions at the Hitchin junctions.</i></p>

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	<i>The document requested as Action Point 23 has been submitted at D6.</i>
Proposed Highway Works to Crawley Green Road/ Wigmore Lane/ Eaton Green Road	No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.
Eaton Green Link Road	No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.
7. Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA)	
Applicant to provide a brief update in relation to the Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) [REP5-041]	<p>The Hertfordshire Host Authorities welcomed the Applicant's comments that any comments received at deadline 5 will be taken on board with the submission of a revised outline TRIMMA at deadline 7. The Hertfordshire Host Authorities also noted that local authorities will have the ability to approve the full TRIMMA post DCO consent.</p> <p>Post hearing note and Action Point 28 to provide comments on outline TRIMMA:</p> <p><i>A review of [REP5-041] track changed version does not show any significant change compared to the version that was submitted at Deadline 4 and reviewed at Deadline 5, just some minor corrections to Table references.</i></p> <p><i>As set out by Stephanie Biggs of WSP in the hearing, there were a number of points raised through comments from the Hertfordshire Host Authorities on the OTRIMMA at deadline 5, which can be summarised as follows:</i></p> <ol style="list-style-type: none"> <i>1) Hertfordshire and North Herts Councils do not agree to the Applicant's proposal to limit the funding for the MT1 schemes to the cost of implementing the currently proposed Schedule 1 mitigations in Hitchin. The cost cap should be based upon interventions that are compliant with local policies and do not conflict with plans set out in the North Central Growth and Transport Plan.</i> <p><i>Hertfordshire and North Herts Councils assume that the reference to 'additional monitoring' relates to sites where new unanticipated impacts come to the fore. It is understood that it will be the responsibility of the local authorities to bring their concerns to the attention of the ATF and to agree with the ATF where monitoring needs to be undertaken. However, without knowing how large the Residual Impact Fund will be, the Host Authorities are unable to take a view on whether this process will adequately address both monitoring and mitigation of unforeseen negative impacts of the airport expansion.</i></p>

Relevant PINS' Agenda Item	Proposed Response
	<p>2) <i>The Hertfordshire Host Authorities have already made representations on the issue of monitoring the traffic associated with the off-site car parks which the expansion of the airport will have an impact on. Proposed monitoring through the MT1 sites to the airport car parks will not pick up all airport related traffic impacts because the ANPR monitoring will fail to capture trips that start or end at unmonitored off-site parking sites (commercial car parks, rented driveways or on-street parking).</i></p> <p>3) <i>The Hertfordshire Host Authorities do not consider that it would be appropriate or acceptable for there to be a pause in the monitoring. The Scheme will still need monitoring of traffic impacts, which could change or settle into a different pattern during any 5-year period as a result of other interventions that London Luton Airport implements through the FTP or MT1 mitigations. There should be no pause in the monitoring process during the Airport growth period, even if growth or expansion is paused. North Herts Council requires direct monitoring of traffic through Hitchin annually.</i></p> <p>4) <i>North Herts Council is satisfied with the proposal to set up monitoring of routes through villages in North Hertfordshire (Great Offley, Tea Green, Breachwood Green, Whitwell, and others), subject to agreement on the locations and reporting, and confirm that discussions are ongoing. There are other sites - including the A1081 north of Harpenden, Annabels Lane / Watery lane on the approach to M1 junction 9, and others, which also need addressing through the proposed monitoring in Hertfordshire.</i></p> <p>5) <i>North Herts Council has asked the Applicant to provide a holistic mitigation plan for the villages south of the A505. A reactive approach is likely simply to displace traffic from one village to another. North Herts Council would also like the applicant to clarify (Transport Assessment §15.2.1c [APP-206]) whether its modelling of airport related impacts on North Herts villages indicates that interventions will be needed, but the locations are uncertain; or if there is a less than high probability of need for any interventions. If the former, then the mitigation strategy should be funded as part of the MT1 mitigations and not through the RIF (which is for “unforeseen consequences”).</i></p> <p>6) <i>Hertfordshire County Council and North Hertfordshire Council are concerned that the MT1 mitigations are one-shot interventions. If they prove ineffective, then there will be reliance on:</i></p> <ul style="list-style-type: none"> <i>a. there being sufficient funding available in the Residual Impacts Fund (RIF) to cover additional measures (the applicant has yet to reveal how much funding will be made available to each local authority each year);</i> <i>b. the Active Travel Forum (ATF) agreeing to fund those additional measures.</i>

Relevant PINS' Agenda Item	Proposed Response
	<p>Post hearing note on Residual Impact Fund (RIF):</p> <p><i>This is allocated on a max per year per authority (for monitoring and mitigation) The Hertfordshire Host Authorities are seeking clarity on:</i></p> <ol style="list-style-type: none"> 1) <i>The total value of funding (even as an approximate range).</i> 2) <i>How funding is proposed to be distributed by year and local authority.</i> 3) <i>Whether district authorities will have a funding allocation or only highway/transport authorities.</i> 4) <i>Whether underspent money will be rolled over indefinitely or clawed back.</i> 5) <i>Whether the ATF will have discretion to vary the spending profile (e.g. to accommodate a large scheme that requires more than one year's allocation) and distribution between LAs (e.g. if impacts are measurably greater in one local authority area than its portion of the RIF).</i> 6) <i>How much autonomy each LA will have in allocating funding, in particular to gather evidence of need for interventions arising from airport impacts, and to develop, design and consult the public on schemes to mitigate those impacts.</i> 7) <i>Whether mitigations will continue to be funded by the RIF even if the airport is in breach of the Level 1 GCG Threshold for Surface Access.</i>
8. Construction	
Construction Traffic Management Plan (CTMP)	<p>No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.</p> <p>Post hearing note and Action Point 34 to provide a list of the roads that they consider should not be used for construction vehicles:</p> <p><i>The OCTMP states 'A principal consideration when identifying designated routes will be the minimisation of travel along any road that does not form part of the Primary Route Network (PRN)'. This is supported. All works traffic should ideally travel via M1 and not on the Hertfordshire network. If absolutely unavoidable only 'A' roads should be utilised (and certainly not the B653), though these too bring with them significant issues – the A1081, for example, routing directly through Harpenden (and onward to St Albans), which is not suitable for construction traffic and the A505 routing into Hitchin.</i></p>

Relevant PINS' Agenda Item	Proposed Response
Construction Workers Travel Plan (CTWP)	<p>No submissions were made on behalf of the Hertfordshire Host Authorities under this agenda item.</p> <p><i>Post hearing note and Action Point 38 to confirm whether there were any traffic and transport related issues experienced during the Project Curium construction works:</i></p> <p><i>There were no traffic and transport related issues caused by Project Curium works alone but there have been high impacts when taken in combination with Highway Authority works on either the A1081 or B653. Both sets of works combined has caused issues and an escalating amount of complaints.</i></p>