



Hertfordshire Host Authorities

HERTFORDSHIRE HOST AUTHORITIES' COMMENTS ON ANY FURTHER INFORMATION / SUBMISSIONS RECEIVED BY DEADLINE 5

London Luton Airport Expansion



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London Luton Airport Expansion

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1 INTRODUCTION

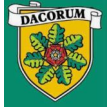
1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1. This document represents a table of responses by the Hertfordshire Host Authorities to certain further information and submissions made by the Applicant at Deadline 5 to be submitted at Deadline 6. It has been prepared jointly by Dacorum Borough Council (“DBC”), North Herts Council (“NHC”) and Hertfordshire County Council (“HCC”), in collaboration with their technical consultants, together as the “the Hertfordshire Host Authorities” to set out further comments considered necessary in detailing the impacts upon the local area of the Applicant’s proposed London Luton Airport Expansion Project (“the Proposed Development”).



2 REP5-013 - CHAPTER 4 THE PROPOSED DEVELOPMENT (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
4.10.9	Landscape and Visual Impact Assessment (LVIA)	The Noise barrier would be approximately 132m in length and 2m tall. As this has been included in the Proposed Development as a result of engagement during examination the barrier is not specifically mentioned in the assessments reported in this Environmental Statement (ES); however, a review of relevant assessments including noise, air quality, landscape and visual and cultural heritage has determined that its inclusion does not materially alter the conclusions of these assessments or result in any new or different likely significant effects. The potential noise benefits from this barrier have not been accounted for and therefore this assessment represents a reasonable worst case.	Noise barriers can be highly intrusive visually. The justification for why this has not been considered does not seem robust within the LVIA within Chapter 14 Landscape and Visual of the ES [AS-079] . Further information needs to be provided regarding omission of its consideration. For example, is it due to it not being visible within any viewpoints or does mitigation adequately screen the barrier from all viewpoints?



3 REP5-021 - GREEN CONTROLLED GROWTH EXPLANATORY NOTE (TRACKED CHANGE VERSION)

- 3.1.1. Please refer to Issue Specific Hearing (ISH) 9 (Green Controlled Growth (GCG) Principles) for the Hertfordshire Host Authorities response on this document.



4 REP5-023 - GREEN CONTROLLED GROWTH FRAMEWORK (TRACKED CHANGE VERSION)

4.1.1. Please refer to ISH 9 for the Hertfordshire Host Authorities response on this document.



5 REP5-027 - GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX B – DRAFT TECHNICAL PANELS TERMS OF REFERENCE (TRACKED CHANGE VERSION)

- 5.1.1. Please refer to ISH 9 for the Hertfordshire Host Authorities response on Green Controlled Growth.



6 REP5-029 - GREEN CONTROLLED GROWTH FRAMEWORK

- 6.1.1. Please refer to ISH 9 for the Hertfordshire Host Authorities response on Green Controlled Growth



7 REP5-031 - GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX D – AIR QUALITY MONITORING PLAN (TRACKED CHANGE VERSION)

- 7.1.1. Please refer to ISH 9 for the Hertfordshire Host Authorities response on Green Controlled Growth.



8 REP5-033 - GREEN CONTROLLED GROWTH FRAMEWORK APPENDIX F – SURFACE ACCESS MONITORING PLAN (TRACKED CHANGE VERSION)

- 8.1.1. Please refer to ISH 9 for the Hertfordshire Host Authorities response on Green Controlled Growth.



9 REP5-035 - DESIGN PRINCIPLES (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
Section 2.2 Design Quality and Section 3 Landscape	LVIA	Design principles added specific to Landscape.	The inclusion of some landscape-specific Design Principles is welcomed. The LVIA should demonstrate how these design principles are to be delivered in broad terms – for example Table 2-1 DQ.01 (b) states that the detailed design will be “responsive to landscape and historical character and function, landscape permeability, landform, and vegetation”. An indication of how this has already been designed in is required, such as how the proposed site layout responds to landform. This cannot be considered solely at detailed design stage. The landscape-specific Design Principles should reinforce the design quality principles. It is suggested that the landscape-specific principles cross reference the design quality principles they are contributing to. It is further suggested that Table 2-1: Design quality design principles should include design intent relating to building massing and heights, which should be further developed within the landscape-specific Design Principles (Section 3). This is needed in order to guide the detailed design stage by ensuring an appropriate response to local character and setting is developed from the outset. This is currently lacking both within the Design Principles document and the LVIA.



10 REP5-038 - TRIP DISTRIBUTION PLANS (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
Figures 1 - 28	Traffic and Transport	Trip Distribution Plans.	The Applicant should provide figures which clearly show the volumes of traffic in numbers on all links as it is impossible to see the traffic flow differences between the scenarios (with / without expansion) presented without this information.



11 REP5-043 - APPLICANT'S RESPONSE TO ISSUE SPECIFIC HEARING 6, ACTION 33: PRINCIPLES OF GOOD DESIGN

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
Table 1.1: ANPS policy compliance Table 1.2 NPPF policy compliance - rows (a), (c), (d)	LVIA	Evidence of Design principles relating to landscape and visual. There may be opportunities for the Applicant to demonstrate good design in terms of siting and design measures relative to existing landscape and historical character and function, landscape permeability, landform, and vegetation. (Paragraph 4.34).	More detail on design intent is required to evidence how the design to date has already considered siting in relation to site landform, how it intends to respond to historic and local character and sense of place. Those features and characteristics in the existing landscape are already present and should be known about – and therefore already considered at Outline Design Stage. What these elements are and how they are being responded to at this stage should be outlined, so that they can then be further developed at detailed design stage.
Table 1.3: LLP (LLP6) policy compliance - row LLP6 F ii	LVIA	LLP6 F ii - Height and design of buildings. Design Outcomes: T.02; T.19; ASF.02; ASF.03 all state: <i>'The detailed design... will adopt appropriate architectural surface finishes on proposed elevations to reduce visual impact.'</i>	More detail on design intent is required to understand what is <i>'appropriate'</i> within this setting, local character and context, such as breaking up the massing of built form when viewed from the east, use of muted colours and so on. The site setting, character and context should already be known and understood and consequently design intent should demonstrate this much more clearly.
Table 1.4: LLP (LLP25) policy compliance.	LVIA	Policy: Buildings and spaces will be of high quality design with distinctive character. General approach: The masterplan for the Proposed Development has responded to the context of the landscape, neighbouring land and property uses, and has considered the need to minimise impact.	The LVIA should clearly demonstrate how the design has responded to local character, setting and context. The Design Principles, including landscape-specific Design Principles should outline design intent in relation to building height, massing, colour and similar to ensure that site context, character and setting has already been appropriately responded to and form - not just in terms of soft landscape planting but in terms of built form responding to local character and identity – in order to create an appropriate framework for the detailed design. The Hertfordshire Host Authorities remain of the view that the introduction of a post-approval independent Design Review and detailed Masterplan post consent, would provide a valuable independent addition to the future design process but note that the Applicant has not yet committed to this in the Applicant's Response to Written Questions - Design [REP4-061], but intends to respond at Deadline 6 [REP5-062].
Table 1.5: Central Bedfordshire Local Plan – row Policy HQ1 High Quality Development	LVIA	Design Outcomes: DQ. 02 - The detailed design of public buildings, landscape areas, public realm and movement routes within the Proposed Development will: a. Respond to the local character and identity where appropriate.	The LVIA and the Design Principles should clearly state how the design is responding to local character and identity – not just in terms of soft landscape planting, but in terms of built form responding to local topography, character and identity.
Table 1.6: North Hertfordshire Local Plan – Row Policy D1	LVIA	Design Outcomes: DQ. 02 - The detailed design of public buildings, landscape areas, public realm and movement routes within the Proposed Development will: a. Respond to the local character and identity where appropriate.	The LVIA and the Design Principles should clearly state how the design is responding to local character and identity – not just in terms of soft landscape planting but in terms of built form responding to local character and identity.



Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
sustainable Design			



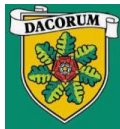
12 REP5-046 - APPLICANT'S RESPONSE TO DEADLINE 4 SUBMISSIONS

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
11	LVIA	The Applicant believes that the Accurate Visual Representations (AVRs) provided as part of the application are appropriate and further design detail and rendering of buildings is not required or justified at this stage.	It is agreed that detailed design and rendering of building facades is not required at this time, subject to further written evidence of design intent. , Further detail relating to design intent is needed in relation to how the current outline design has already responded to local context, character, and setting, such as anticipated approach to building massing (e.g., breaking up of roof lines and horizontal mass to reduce perception of size from identified key locations); façade treatment in broad terms to indicate anticipated colours (e.g., muted, non-reflective, non-white); how block layout has responded to site levels to reduce impact from key visual receptors and so on. This is currently lacking, with no indication of how the current design has responded at all to existing character, context or setting. Such issues should be clearly identified in the LVIA with the design intent secured in the Design Principles [REP5-034] document.



13 REP5-048 - APPLICANT'S RESPONSE TO DEADLINE 4 SUBMISSIONS APPENDIX B - DACORUM BOROUGH COUNCIL, HERTFORDSHIRE COUNTY COUNCIL & NORTH HERTFORDSHIRE COUNCIL (RESPONSE TO D3 DOCUMENTS) [REP4-163]

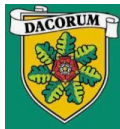
Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
1	Surface Access (off site highway works at Hitchin junctions)	<p>The works proposed at the three junctions in Hitchin are relatively minor highway capacity-based solutions. The Hertfordshire Host Authorities have ongoing concerns that the proposals do not meet their policy requirements in terms of providing for sustainable travel (active travel and public transport) in relation to their Growth Transport Plan (GTP) and also that a larger more expensive scheme will not be possible if it is not developed at the planning stage. This is because additional funding may not be available or would be competitive through the Sustainable Transport Fund (STF), and therefore an enhanced scheme may not be delivered.</p> <p>The Applicant has responded to reference their responses in relation to this matter in the Applicant's Response to Relevant Representations Part 2A of 4 (Local Authorities) [REP1-021] pages 229 and 231, in response to RR-0558, RR-1119, and RR-0297 and referenced the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) [REP4-085], issued at Deadline 4.</p>	<p>Whilst the Applicant states that the implementation of alternative mitigation at the three Hitchin junctions is not precluded by their current proposals, Hertfordshire County Council and North Hertfordshire Council do not consider the Applicant's proposal to limit the scheme funding value to the currently scoped minor capacity improvements to be sufficient.</p> <p>The Applicant's response in relation to the policy compliance of the proposed mitigation and the possibility to bring the implementation of the measures forward if the monitoring showed it necessary through the OTRIMMA is welcomed. However, the proposed Hitchin junction mitigation measures in Schedule 1 of the DCO remain a principal area of disagreement for Hertfordshire County Council and North Hertfordshire Council for the following reasons:</p> <p>1) The modelling of the Hitchin junctions as presented in the response to the Applicant's Response to Issue Specific Hearing 4 Action 8: Off-site Highway Works [REP4-082]. In relation to this response, the Hertfordshire Host Authorities have the following comments:</p> <ul style="list-style-type: none"> • The Applicant should provide the collected traffic count data as well as the forecast data to enable an understanding of any change to trip routing through the junctions. • A traffic survey of Park Way / Upper Tilehouse St junction from 2019 shows quite different flows to those currently included in the modelling of this junction. The assumptions used in the modelling need further verification. • A traffic survey to confirm the traffic flow and turn count data at Wratten Road is required. The modelling currently assumes a nominal value which has not been validated and the turning movements from this approach could impact the other approaches.



Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
			<ul style="list-style-type: none"> Modelling results in the Applicant's Response to Issue Specific Hearing 4 Action 8: Off-site Highway Works [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 that represents the existing highway network 'with proposed development' (without mitigation), 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. In some cases, this is leading to a reduction in traffic flows. The modelling also doesn't reflect any Covid-19 updates. <p>2) North Hertfordshire Council are concerned that the Applicant has focused solely on accommodating an increase in motor traffic, rather than enabling and supporting a higher modal share for sustainable travel east of Luton and supporting their local policy for active and sustainable travel improvements.</p> <p>3) There is an absence of data on the traffic impacts on villages east of Luton including Tea Green, King's Walden, Preston, Breachwood Green, Whitwell, Peter's Green, Kimpton and Codicote.</p> <p>4) The Hitchin junction mitigation proposals are inconsistent with the Applicant's own "indicative principles" for MT2 mitigations (as provided in the OTRIMMA [REP4-085] which have a "Requirement to consider that all works include a commitment to enhance conditions for active travel".</p> <p>The Hertfordshire Host Authorities have also provided detailed comments on the OTRIMMA at Deadline 5 [REP5-042].</p>
2	Surface Access (TRIMMA locations)	The Hertfordshire Host Authorities are concerned that the TRIMMA sites in Hertfordshire may not be adequate to capture the travel demand associated with London Luton Airport via rural routes. As a starting point, the Hertfordshire Host Authorities have identified 6 additional sites which would benefit from the	The Hertfordshire Host Authorities propose that the six additional monitoring sites form part of the core monitoring strategy and are not treated as 'additional sites' under the OTRIMMA, which expect that monitoring is undertaken by the local authority to demonstrate there is a problem. The six locations should be included in the MT1 monitoring network.



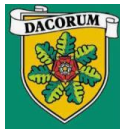
Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
		London Luton Airport Automatic Number Plate Recognition (ANPR) monitoring.	
3	Surface Access (Rail capacity)	The Applicant has provided an additional document at Deadline 5 dedicated to the assessment of the rail capacity – Rail Impacts Summary [REP5-057] .	See response to the Rail Impact Summary [REP5-057] .
4 & 5	Surface Access (Bus and Coach)	The Applicant has provided an additional document at Deadline 5 dedicated to the assessment of the bus and coach network and prioritised potential future bus and coach routes – Bus and Coach Study [REP5-058] and a separate document in relation to the Sustainable Transport Fund (STF). See Applicants response to ISH4 – Action 26 – Sustainable Transport Fund [REP5-056] .	See response from the Hertfordshire Host Authorities to the Bus and Coach Study [REP5-058] . See response from the Hertfordshire Host Authorities to the Applicants response to ISH4 – Action 26 – Sustainable Transport Fund [REP5-056] .
12	Surface Access (Modelling assumptions)	<p>The Hertfordshire Host Authorities are keen to ensure that their network is sufficiently protected and mitigated from the additional traffic associated with the development and access to London Luton Airport from the east. The Hertfordshire Host Authorities would like to see further details of the modelling outputs to understand the wider forecast traffic increases within their network. See Hertfordshire Host Authorities' Principal Areas of Disagreement Summary Statement [REP2-058], and Relevant Representations (RR) [RR-0558, RR-1119, RR-0297].</p> <p>The Applicant has referenced the Transport Assessment Appendices – Part 2 of 3 (Appendix F) [APP-201].</p> <p>Para. 7.4.5 states <i>'there are forecast to be traffic flow increases on rural routes to the east of Luton towards the A1(M) to the south of the A505,'</i>.</p> <p>Para. 7.4.6 states <i>'These forecast flow increases on rural routes to the east of Luton are due to the additional connectivity provided by the AAR to the east of Luton, resulting in these routes being forecast to be more attractive than the alternative A505 route to / from Hitchin and the A1(M)'</i>.</p>	<p>The Hertfordshire Host Authorities would like to see further details of the modelling outputs to understand the wider forecast traffic increases within their network and to understand the points being referenced in the Applicant's response. The trip distribution plans supplied to date do not provide sufficient detail (including numbers of vehicular trips) within the Hertfordshire highway network. See Trip Distribution Plans (Tracked Change Version) [REP5-038].</p> <p>The Hertfordshire Host Authorities are also awaiting further clarification of the proposed change in catchment for all modes associated with the Proposed Development. See Hertfordshire Host Authorities Principal Areas of Disagreement Summary Statement [REP3-091].</p>
9	LVIA	The Applicant does not consider it necessary to provide additional AVR's showing the proposed vegetation in a predominantly defoliated state.	It is agreed that additional AVRs showing proposed vegetation in a defoliated state is not required at this time, subject to further written



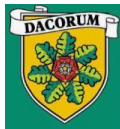
Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
		<p>The illustrative views / photomontages of the vegetation provided enable the effects of introducing this planting into these views to be understood.</p>	<p>evidence in the LVIA of which planting elements have been specifically included to reduce visual impacts (as opposed to biodiversity or local character purposes) and at which key receptor locations.</p>
6	Green Controlled Growth Framework (GCGF) (Air Quality)	<p>The Applicant proposes that monitoring data to be open source, much like its existing monitoring data from the air quality monitoring station at Wigmore Valley Park. Therefore, near real-time monitoring data will be available to the Airport Operator and the Environmental Scrutiny Group (ESG), to allow continuous review of the monitoring results throughout the year to allow for an early warning. It will be in the interests of the Airport Operator to monitor air quality throughout the year and to take action where risks of exceedances are identified in order to avoid reporting the breach of a Limit and associated restrictions on London Luton Airport growth.</p> <p>However, the monitoring report will be produced annually which will provide the final ratified annual results, which will inform the decision for whether action via the GCG process is required. This does not preclude any actions that the operator may well decide to take in light of an early warning.</p>	<p>The Hertfordshire Host Authorities would request the Applicant advises the ExA how the Hertfordshire Host Authorities would be notified in the event of an early warning being triggered and of the action taken. Presumably, an automated email alert system could be implemented for continuous monitoring based on the level 1 and 2 and Limit Thresholds on a rolling basis. In the event of an alert, the Hertfordshire Host Authorities would wish to receive a report in a timely manner, detailing the circumstances and any action taken.</p>
13	GCGF (Air Quality)	<p>As outlined at Paragraph 7.13.2 of Chapter 7 of the Environmental Statement [AS-076], operational monitoring is described in the Outline Operational Air Quality Plan [APP-065], secured through Requirement 31 of the Draft Development Consent Order [REP4-003]. The Outline Operational Air Quality Plan states at Paragraph 2.8.4 that there is a commitment to continue the current Luton Rising air quality monitoring beyond 2043 and undertake annual air quality monitoring results to be available to the public and the local authority.</p> <p>The locations of current air quality monitoring locations are detailed in Environmental Statement Appendix 7.2: Air Quality Baseline Data [APP-062] at Table 1.1 and Table 1.6. This includes both automatic and diffusion tube monitoring sites within the boundary of London</p>	<p>The Applicant's commitment to continue Luton Rising air quality monitoring beyond 2043 is welcomed. The Hertfordshire Host Authorities would request that continuous monitoring for NO₂, PM₁₀ and PM_{2.5} is also included at London Luton Airport diffusion tube site LLA 4 (Runway Threshold Eastern), close to the North Hertfordshire district and London Luton Airport boundaries.</p>



Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
		Luton Airport and close to London Luton Airports perimeter. This data is available for London Luton Airport to use in analysis of GCG monitoring data to facilitate the investigation of London Luton Airport's contributions to a limit exceedance.	
17	GCGF Explanatory Note (Air Quality)	Paragraph D2.1.5 of the Green Controlled Growth Framework Appendix D: Air Quality Monitoring Plan [REP5-030] sets out that near real-time monitoring data will be available to the operator and ESG to allow continuous review of the monitoring results throughout the year to allow for an early warning.	The Hertfordshire Host Authorities would request the Applicant advises the ExA how the Hertfordshire Host Authorities would be notified in the event of an early warning being triggered and of the action taken. Presumably, an automated email alert system could be implemented for continuous monitoring based on the level 1 and 2 and Limit Thresholds on a rolling basis. In the event of an alert, the Hertfordshire Host Authorities would wish to receive a report in a timely manner, detailing the circumstances and any action taken.
23	Surface Access (Modelling)	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.	The Host Authorities will review the final report when it is submitted at Deadline 6.
24	Surface Access (Modelling)	<p>Can the Applicant confirm to the ExA why HCC site 232 has not been taken into consideration in the count analysis? The area shown in Slide 10 (page 12) from which traffic counts have been used to undertake comparisons between 2016 and 2023 is a lot smaller than the simulation network, presented in Figure 18.3 of Chapter 18 Traffic and Transport of the ES [AS-030].</p> <p>The Applicant should provide justification as to why counts across the wider simulation network have not been considered. As a result of a smaller area being considered, the number of counts used for the local network is very small, only two have been used for HCC and two for Central Bedfordshire Council (CBC). This is not adequate enough to provide a clear picture of the changes in traffic flow across the study area between 2016 and 2023. It is expected that trends between 2016 and 2023 will vary between different vehicle types therefore this is an important aspect of the analysis which appears not to have been undertaken. The Applicant should clarify whether comparisons</p>	The Hertfordshire Host Authorities can confirm that they are happy as to why site 232 has not been taken into consideration. Hertfordshire County Council provided data for 8 sites - the Applicant should confirm why only 2 sites have been used.



Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
		between vehicle types have been undertaken, cars, LGV's and HGVs.	
A	Surface Access (Modelling)	Site 372 sees a significant decrease in peak hour traffic post Covid-19. The Applicant should confirm the month the data has been compared for and that it is consistent between the years. The Applicant should clarify whether there is any other explanation for this reduction other than Covid-19.	The Applicant should clarify to the ExA whether they have investigated any other potential causes, with the local authorities for example, to understand whether there is any other explanation for this reduction, other than Covid-19.
26	Surface Access (Modelling)	The Applicant should confirm the month which data has been used for at each site. At both sites there is a significant reduction in peak hour traffic, in excess of 20% in some instances. The Applicant should clarify whether there is any other explanation for this reduction other than Covid-19.	The Applicant should clarify to the ExA whether they have investigated any other potential causes, with the local authorities for example, to understand whether there is any other explanation for this reduction, other than Covid-19.
27	Surface Access (Modelling)	It is stated that <i>“Trends analysis conclusion – SRN largely ‘recovered’, Local Road Network (LRN) not ‘recovered’ and there may therefore be a case for post model slight downward adjustment to traffic forecasts”</i> . This is not correct. The adjustment should be to the base year traffic flows upon which forecasts are developed (and possibly to the traffic forecasts in addition). The Applicant should explain what adjustments they plan to make to the base and future year forecasts.	<p>The Applicant has undertaken the analysis of data pre and post Covid-19 and found trends which shows the LRN has a lot more traffic on it compared to post Covid-19 counts, but they have not made any adjustments to take this into consideration within the traffic modelling work.</p> <p>On 12th October 2023, the Hertfordshire Host Authorities had a meeting with the Applicant who summarised the findings of their count analysis. The Applicant said that the trends analysis suggested a case for slight downward adjustments to forecasts and said the risk to the process was low as mitigation measures were considered robust and the recommendation was adjustments were only required for the purposes of the VISSIM model and for Air Quality / Noise assessment.</p> <p>Nothing was agreed at the meeting on 12th October 2023, the Hertfordshire Host Authorities are still awaiting further information and justification on the methodology and approach adopted. On the basis of the information the Applicant have provided, the Hertfordshire Host Authorities have concerns about the high level of traffic on the LRN in the base year, compared to counts and the impacts this could have on London Luton Airport traffic in forecasting assignments.</p>

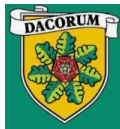


Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
28	Surface Access (Modelling)	The Applicant should confirm whether this graph is showing National or Local Growth Productions by mode.	The Applicant should provide comparisons of the National data against the local data (Luton and HCC) for National Trip End Model (NTEM) 7.2 and NTEM 8.
29	Surface Access (Modelling)	The Applicant should confirm whether this graph is showing National or Local Growth Productions by mode.	The Applicant should provide comparisons of the National data against the local data (Luton and HCC) for NTEM 7.2 and NTEM 8.
30	Surface Access (Modelling)	The Applicant should confirm whether this graph is showing National or Local Growth Productions by mode.	The Applicant should provide comparisons of the National data against the local data (Luton and HCC) for NTEM 7.2 and NTEM 8.
31	Surface Access (Modelling)	<i>“Demand model and highway assignment model runs taking place for reporting in October, including new 2023 forecast year and comparison with count data.”</i> The Applicant should confirm the methodology adopted to produce the 2023 forecast matrices.	The Applicant should clarify how the 2023 forecast year has been developed. There is insufficient information on this in the Applicant’s Response to Issue Specific Hearing 4 Action 2: Covid 19 [REP4-106] . The Applicant should clarify how the outcomes in the Applicant’s Response to Issue Specific Hearing 4 Action 2 - Covid 19 Additional Modelling Technical Note 1 [REP4-086] have been taken into consideration in the 2023 forecast.
32	Surface Access (Modelling)	No information has been provided in the pre and post Covid-19 changes in use of public transport bus / rail / air. The Applicant should provide information of the analysis undertaken.	The Applicant should provide some commentary on the changes in bus / rail use in the study area between 2016 and 2023. The use of public transport post-Covid-19 will affect the mode share of trips which could result in greater volumes of highway traffic. The Applicant should provide the evidence to show that no changes in baseline and future mode choice are justifiable.



14 REP5-055 - APPLICANT’S RESPONSE TO ISSUE SPECIFIC HEARING 4 ACTION 7 - UPDATES ON ROAD SAFETY AUDITS

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
Applicant's Response to Issue Specific Hearing 4 Action 7 - Updates on Road Safety Audits [REP5-055], Appendix C	Surface Access – Road Safety Audit at Three Hitchin junctions.	The Applicant has submitted the Applicant's Response to Issue Specific Hearing 4 Action 7 - Updates on Road Safety Audits [REP5-055] detailing the Stage 1 Road Safety Audit and the Designers' Response.	<p>Hertfordshire County Council will respond to the Road Safety Audit (RSA) Stage 1 Audit and the Designers' Response as part of the formal process for the approval of highway design schemes with Hertfordshire County Council and completing the necessary forms associated with the RSA.</p> <p>Overall, in relation to the proposed highway mitigations at the three Hitchin junctions (contained in Schedule 1 of the DCO), the Hertfordshire Host Authorities have requested that further design work is undertaken by the Applicant to meet policy requirements at these junctions, to ensure acceptable policy compliant mitigations are built into the London Luton Airport expansion cost plan, to give certainty that enhanced measures could be provided. This was requested in the Hertfordshire Host Authorities Principal Areas of Disagreement Summary Statement [REP3-091] at Deadline 3.</p>



15 REP5-056 - APPLICANT’S RESPONSE TO ISSUE SPECIFIC HEARING 4 ACTION 26 - SUSTAINABLE TRANSPORT FUND

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
<p>Applicant’s Response to Issue Specific Hearing 4 Action 26 - Sustainable Transport Fund (STF) [REP5-056].</p>	<p>Surface Access – STF.</p>	<p>The Applicant has provided the Applicant’s Response to Issue Specific Hearing 4 Action 26 - Sustainable Transport Fund [REP5-056], a separate document to provide details of the STF, including the funding source, size, scope and governance.</p>	<p>The document identifies the level of the fund that could be available, but it does not identify a potential cost associated with the Framework Travel Plan (FTP) Toolkit of improvements, so it is still unclear whether the fund will be sufficient to implement the sustainable measures over time. The Applicant should confirm if the annual value matches the potential spend across the six priority areas. The Applicant should also confirm if it is ambitious enough and if it would provide sufficient measures to influence the behaviour change that is needed to support the growth of London Luton Airport and increased catchment via Hertfordshire. The Applicant should provide details of the possible toolkit of measures to give a better understanding of how far the proposed level of funding could go.</p> <p>The Applicant should provide details of 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, could the administration of the spending result in some authorities across the region not getting any of the funding?</p> <p>Paragraph 3.3.10 refers to comments on the size of 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) “<i>The feasibility of this approach is under consideration</i>”. The Hertfordshire Host Authorities consider that the funding for early public transport (bus and coach) service intervention is essential.</p> <p>The STF parking levy is shown in the study to stop when London Luton Airport reaches 32 million passengers per annum (mppa) mppa, but the monitoring has been extended to five- years post completion. The STF should also be provided for at least the same timescale. However, the fund capping suggests that when London Luton Airport reaches maximum capacity, there will be minimal / no investment in sustainable transport required. The Applicant should confirm what happens to the remaining fund for the STF at this point.</p> <p>As the STF is funded through the parking levy, can the fund be retained in perpetuity? The Applicant should confirm if there is certainty that there will not be a need for support for sustainable transport measures beyond the 32 mppa.</p> <p>As detailed in the Hertfordshire Host Authorities’ Principal Areas of Disagreement Summary Statement [REP3-091], it is unclear how the STF will be used to deliver sustainable transport improvements, particularly with regards to public transport and the necessary early pump-priming of bus services to effect travel behaviour and whether sufficient funding will be available for the range of measures that could draw on this fund.</p> <p>Regarding the Framework Travel Plan (Tracked Change Version) [REP4-045], the tables in the ‘Toolbox of Interventions’ demonstrate that there will</p>

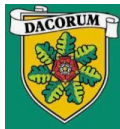


Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
			<p>be a lot of competing demand on the STF from the toolbox of potential interventions across the various modes. It is still not clear that sufficient funding will be available at the appropriate time through this limited fund to implement these measures and how the funding will be fairly allocated to the varying competing demands across modes and authorities.</p> <p>Hertfordshire Host Authorities' Principal Areas of Disagreement Summary Statement [REP3-091] raises that the Applicant should provide clear details on how the STF will be used to deliver sustainable transport improvements, particularly public transport. Further bus service identification and measures to secure and provide them should be detailed to demonstrate sufficient funding will be available.</p>



16 REP5-057 - RAIL IMPACTS SUMMARY

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
<p>Rail Impacts Summary [REP5-057], Section 2.7, Para 2.7.2</p>	<p>Surface Access - Rail</p>	<p>The Applicant has provided a separate document detailing the assessment of rail passengers and assessed the expected impacts in terms of on-train crowding, capacity of the Luton Direct Air-Rail Transit (DART) and the capacity of London Luton Airport Parkway station.</p> <p>London Luton Airport demand by rail on stations outside Luton Airport Parkway is not evaluated and para 2.7.2 Hertfordshire’s Written Representation [REP1-069] is quoted in relation to the impacts of the Proposed Development on St Albans and Harpenden rail stations. The impact is not expected to be significant because:</p> <ul style="list-style-type: none"> • Civil Aviation Authority (CAA) data indicates that St Albans (the Local Authority area) provides less than 3% of total rail passenger demand for London Luton Airport passengers. • For the AM peak (06:00-09:30) and PM peak (16:30-19:30) periods there is forecast rail demand of 1,960 and 1,908 respectively in 2043 (when 32 mppa airport passengers is expected to be reached), compared to 730 and 905 for the AM and PM peak periods in the base year. With 3% of passengers coming from St Albans this represents an increase of 36 and 30 passengers respectively in the peak direction over a 3-hour period compared to the base year. • These passengers would be distributed across both Harpenden and St Albans stations and over the 3-hour period. St Albans station has recently undergone a capacity upgrade including a second footbridge adding capacity for passengers. <p>It is the Applicant’s position that when compared to existing demand at these stations during the peak, the low level of change (less than 40 passengers over the peak period) does not require further detailed assessment.</p>	<p>It is noted that the assessment for the rail impacts summary is centred around the passenger growth only and does not account for staff growth or the desire to reduce mode share by private vehicles in the future.</p> <p>It is understood that Network Rail are assessing the network capacity and will be reporting on this at Deadline 7. The Hertfordshire Host Authorities will be interested to understand their response in due course.</p> <p>In the meantime, the low level of expected mode share by rail alongside the lack of public transport (bus and coach) provision in Hertfordshire, the Hertfordshire Host Authorities remain concerned that the expectation is that private vehicle travel through Hertfordshire for access to London Luton Airport will remain dominant, with no substantial proposals to address this.</p>



17 REP5-058 - BUS AND COACH STUDY

Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
	Surface Access – Bus and Coach	The Bus and Coach Study details the existing bus network for London Luton Airport and appraises potential future routes to set a priority for routes which could be provided as part of the Framework Travel Plan (FTP), through the sustainable transport fund (STF).	<p>The content of the Bus and Coach Study [REP5-058] does not change the Hertfordshire Host Authorities overall stance in relation to bus and coach travel and the financial support and timing of implementation of new or improved bus or coach services up front as ‘pump-priming’ for the new routes / service.</p> <p>It does not suggest a timescale or provide certainty around funding through the STF or commit to providing new / enhanced routes in Hertfordshire. The report conclusions make bold statements (para 5.1.6) that the prioritised improvements will help Preston, Letchworth and Welwyn. However, the Host Authorities do not consider that this conclusion matches with the improvements set out in Table 3.1 - the Hertfordshire Host Authorities would like further detail on the prioritised services for Hertfordshire.</p> <p>With the low level of forecast rail travel from Hertfordshire (3% has been quoted from St Albans / Harpenden) alongside the lack of confirmed provision for new bus / coach services from Hertfordshire, it is difficult to understand how the proposed mode share targets for rail and bus / coach will be achieved to support the London Luton Airport growth. This raises concerns with the Hertfordshire Host Authorities that the assumption for travel to London Luton Airport from Hertfordshire is still mainly reliant on private car travel and there are no firm proposals as part of the DCO application to change this.</p> <p>The Hertfordshire Host Authorities expect a proactive approach to pump prime services, so that there are realistic travel opportunities by bus and coach from the start of the Proposed Development from Hertfordshire. There are some detailed points that follow:</p> <ul style="list-style-type: none"> • The study omits the National Express 788 service which provides connection from the east and the only one that stops at Hitchin. This route should be included in the study. • The journey time savings on the A100 route do not seem to match expected journey times on those routes: a saving of 15-20 minutes is proposed by bus when the direct driving time between Luton and Stevenage is 26-55 minutes. Could the Applicant clarify this point. • What specifically are the “new stops at key urban areas and transport hubs” that are proposed on the new A100 route? As a limited stop service, it needs to be branded as a premium service with high quality vehicles / luggage space, etc.



Reference	Topic	Matters Raised	Hertfordshire Host Authorities Comment
			<ul style="list-style-type: none"> • 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). This is omitted from the study. Table 3.2 sets out some potential new coach services - the Hertfordshire Host Authorities would like to clarify whether any of these could provide a link to Hemel. • Appendix B does not show how all the services have been assessed and the Hertfordshire Host Authorities need to have all this information to understand the conclusions that have been made. There are some obvious gaps in provision and issues with timings of services if these are to be realistically used by staff or passengers, particularly with the 366 service which is in Hertfordshire's South Central Growth and Transport Plan (package 16 – PR103). Hertfordshire is therefore keen to see improvements in this corridor. • It is not clear how the three bus services (100, A100 and 101) will attract new passengers and avoid competing in a destructive way. The Applicant should clarify this point. • North Hertfordshire Council had raised the issue of improving connectivity to London Luton Airport from Hitchin railway station, however this has not been addressed in the study. The 788 service frequency could be enhanced with an additional stop at Hitchin rail station, offering a fast rail-coach service to London Luton Airport. • How does the Applicant propose to improve coach connections to London Luton Airport from East Anglia (Cambridge, Norwich, Ipswich, etc). • What modelling has the Applicant done on how the London Luton Airport expansion has broadened the range of destinations served; will it alter the catchment area for London Luton Airport (i.e., attracting passengers who might currently travel to one of the other London airports)?