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London Luton Airport Expansion

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Volume 8 Additional Submissions (Examination)

**8.161 Applicant's Response to Written Questions -
Traffic and Transport**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.161

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

**London Luton Airport Expansion Development Consent
Order 202x**

**8.161 APPLICANT’S RESPONSE TO WRITTEN QUESTIONS –
TRAFFIC AND TRANSPORT**

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1 RESPONSE TO EXAMINING AUTHORITY WRITTEN QUESTIONS (TRAFFIC AND TRANSPORT)

Table 1.1: Responses to the Examining Authority's Written Questions (Traffic and transport)

PINS ID	Question / Response
TT.2.1	<p>Question:</p> <p>Transport modelling</p> <ol style="list-style-type: none"> 1. Relevant Highway Authorities: Review the final report summarising the outcome of the accounting for Covid-19 in transport modelling that should be submitted by the Applicant on 15th December 2023 [AS-159]. Provide a summary of any outstanding concerns and what needs to be amended/included in order to satisfactorily address the concern(s) by D7. 2. Applicant: If there are outstanding concerns please review and provide details of how they will be resolved during the Examination by D8. <p>Response:</p> <p>The Applicant confirms it will respond by Deadline 8 to any concerns raised by the relevant highway authorities in response to this question.</p>
TT.2.2	<p>Question:</p> <p>Environmental Assessment</p> <p>Chapter 18 of the ES [AS-030] explains that the assessment of significant effects has been defined in accordance with the Institute of Environmental Assessment Guidance: Guidance Notes No. 1, Guidelines for the Environmental Assessment of Road Traffic (1993). However, the latest version of this guidance was published in July 2023 (Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement). Explain what the implications are for the assessment presented in Chapter 18 of these replacement guidelines.</p> <p>Response:</p> <p>The document referred to by the Examining Authority was published following submission of the application for development consent. This new document has been reviewed to determine whether the analysis that has been reported in Chapter 18 Traffic and Transportation of the ES [AS-030] would have changed had it been published prior to the assessment. The first point to note is that the two broad rules-of-thumb that there is unlikely to be an environmental effect if the change in traffic flow is less than 30%, or 10% on sensitive links, as described in paragraph 2.2.1 of Appendix 18.1 Traffic and Transportation Methodology [APP-128] have been retained in the new Guidance Note.</p> <p>The assessments that have been reported in the chapter are, severance, driver stress, driver delay, pedestrian delay, pedestrian fear and intimidation, collisions and safety, hazardous and dangerous loads. The topics that are identified in the new Guidance Note as requiring consideration are:</p> <ol style="list-style-type: none"> a. severance; b. driver delay; c. pedestrian delay; d. non motorised user amenity; e. fear and intimidation; f. road safety;

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	<p>g. road safety audits; and h. hazardous loads/large loads.</p> <p>It can be seen that the two lists are very similar although there are some minor changes in title. Chapter 18 Traffic and Transportation of the ES [AS-030] considered driver stress which is not identified in the new Guidance Note but could be considered to be covered in 'fear and intimidation'. The description of the way in which 'non-motorised user amenity' should be assessed in the new Guidance Note is similar to the assessment that was undertaken for 'pedestrian fear and intimidation' in the ES chapter. Therefore, it is considered that the first six bullet points in the new Guidance Note are covered by the methodology that was adopted.</p> <p>The advice on 'road safety audits' is that the standard and prescribed Road Safety Audits should be used to review the road safety attributes of any proposed engineering changes in the adopted highway prior to submission. This is an observation and does not require any analysis in the ES. Road Safety Audits have been undertaken for the proposed highway works and shared with relevant Highways Authorities.</p> <p>The consideration of hazardous loads has been enlarged to cover large loads. Abnormal loads are considered in section 4.5 of Appendix 18.3 Outline Construction Traffic Management Plan of the ES [REP6-009]. Since the Site has a dual carriageway link to the M1 it is not considered that, subject to the procedures outlined in Appendix 18.3 being followed, abnormal/long loads would cause any significant detrimental environmental effect.</p> <p>It has therefore been concluded that there is no need for further assessment as a result of the Institute of Environmental Assessment Guidance being re-issued in July 2023.</p>
TT.2.3	<p>Question:</p> <p>GCG</p> <p>The relevant representations from the relevant highway authorities raised concern that the mode share percentages could be masking increases in traffic on the highway network. Explain how the mode share percentages relate to traffic on the network and signpost to exactly where in the application documents this is explained.</p> <p>Response:</p> <p>The methodology, inputs and assumptions used to forecast the expanded airport trip generation for the three assessment phases are set out in section 9.5 of the Transport Assessment [APP-205]. This section includes the passenger mode split and trip generation (see Tables 9.5 and 9.6 of the Transport Assessment) and the staff mode split and trip generation (see Tables 9.7 and 9.8 of the Transport Assessment) along with the HGV and LGV trip generation (see Table 9.9 of the Transport Assessment). These trip generations have then been used in the transport modelling. The mode shares do not mask increases in traffic on the highway network but are a component of the trip generation calculation. The methodology used to forecast the trip generation including staff and passenger mode shares was discussed and agreed with the highway authorities during the scoping of the Transport Assessment. Regardless of matters relating to Green Controlled Growth mode shares, the Applicant is committed to monitoring and mitigating the traffic impact of the Proposed Development on the public highway; as secured in the Outline Transport Related Impacts Monitoring and Mitigation Approach (OTRIMMA) [TR020001/APP/8.97].</p>
TT.2.4	<p>Question:</p> <p>Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA)</p> <p>In the TRIMMA [REP5-041] the extent of the proposed monitoring in terms of programme during the year is not defined. Explain how the data collected are representative of a typical level of traffic.</p> <p>Response:</p> <p>The OTRIMMA [REP5-041], updated at Deadline 7 [TR020001/APP/8.97], is a representation of the final TRIMMA in outline form. The annual monitoring had not and has not been fully defined, but will be defined in the final TRIMMA, which will be submitted for the approval of the relevant planning authority under Requirement 29 of the DCO. The</p>

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	Applicant has held discussions with the airport operator and confirmed that where the data is available it will be provided on an hourly basis throughout the year. Therefore, all necessary data to make the traffic data representative of typical levels will be available.
TT.2.5	<p>Question:</p> <p>TRIMMA [REP6-057] responds to the D5 submissions of the Hertfordshire Host Authorities [REP5-068]. Point 17 on Table 1.1 has not been responded to appropriately. The concern was that the monitoring locations proposed were not suitable to capture traffic using off-site car parks. However, the Applicant's response referred to section 3.4 of the Outline Transport Related Impacts Monitoring and Mitigation Approach [REP5-041] that simply describes the Applicant's position regarding offsite car parking and did not address the monitoring concern. Provide an appropriate response.</p> <p>Response:</p> <p>Trips associated with off-site parking facilities have not been excluded from the design of proposed off-site highway mitigation works. Trips between such facilities and non-airport locations have been forecast for each assessment year and included in the modelling as background traffic. This traffic, in combination with trips from the Proposed Development, was assessed and used to inform the locations and design of off-site highway mitigation.</p> <p>Expansion of off-site car parks will not be directly related to the Proposed Development. Whilst the Applicant agrees that the market for off-site parking will likely increase (and has therefore allowed for such an increase in the design of off-site highway works), the Applicant has no control over off-site car parking facilities and thus cannot influence their expansion.</p> <p>The passenger private vehicles entering/exiting an off-site car park will not be monitored as part of the TRIMMA. Trips between such facilities and the airport by shuttle buses will be monitored as part of the TRIMMA data collected at the airport. There is no proposal to update the OTRIMMA to include further monitoring of traffic associated with off-site parking.</p>
TT.2.6	<p>Question:</p> <p>TRIMMA Consider if the TRIMMA [REP5-041] could or should be amended so that expenses incurred in evidencing schemes to be funded by the Residual Impact Fund (RIF) would be reimbursed if found to meet the requirements of the TRIMMA mitigation type 2. If this is not possible explain why not.</p> <p>Response:</p> <p>The Applicant has reconsidered this matter and has represented this in section 4 of the updated OTRIMMA document that has been submitted at Deadline 7 [TR020001/APP/8.97].</p>
TT.2.7	<p>Question:</p> <p>TRIMMA The Hertfordshire Host Authorities post hearing submission [REP6-097] included a post hearing note which raised seven clarification questions regarding the RIF. Please provide a response.</p>

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	<p>Response:</p> <p>The Applicant has provided responses to comments in REP6-097 in the Applicant's Response to Deadline 6 Submissions - Appendix G - Dacorum Borough Council, Hertfordshire County Council, North Hertfordshire Council submitted at Deadline 7 [TR020001/APP/8.163].</p>
TT.2.8	<p>Question:</p> <p>Framework Travel Plan [REP4-044] states that the targets in the first Travel Plan will be set with reference to the most recent staff survey data. In [REP5-068] the Hertfordshire Host Authorities queried the sample size of the staff survey. The Applicant responded in [REP6-057] stating staff survey was distributed to every London Luton Airport employee with an ID pass and that based on the total staff numbers, a response rate of 6-7% was estimated. The Applicant stated that it recognised that the staff survey response rate was low but would work to increase this rate for future surveys with measures to increase awareness of the survey and incentivise staff to complete it when distributed. Explain how would staff be incentivised to complete the annual staff travel survey in the future and what response rate would you consider is sufficient and why.</p> <p>Response:</p> <p>The Applicant would seek to follow best practice in the design of the staff survey to improve the response rate. This would be the responsibility of the Travel Plan Coordinator. Ensuring the purpose of the survey is understood by all staff by including a covering letter from senior management explaining the purpose and importance of the survey will raise its profile and encourage staff to take it seriously. Measures such as the inclusion of a prize draw can be used to incentivise the survey. The survey can be distributed in multiple ways (on-line and paper-based) to contact as many staff as possible. It will be important that all airport staff receive the survey including those that do not have access to email.</p> <p>The Travel Plan Co-ordinator will establish when in the year the survey should be distributed to increase the response rate. It will also be important to make sure there are no other surveys taking place at that time to avoid survey fatigue and to avoid confusion between surveys.</p> <p>Guidance on what is considered a sufficient response rate varies. It should be noted that the staff survey will target airport ID holders who will be from multiple organisations and response rate targets need to reflect the complexity of the airport environment. Available information states that organisations should aim to achieve a response rate of between 10% and 30% for baseline surveys, or at least be able to provide assurance to the relevant local authority that the sample is representative if this response rate is not achieved.</p> <p>The Applicant also notes the requirement within paragraph F2.2.5 of the Surface Access Monitoring Plan [TR020001/APP/7.08, Appendix F] that <i>“The airport operator should use reasonable endeavours to ensure that all active airport ID passholders are surveyed and the survey period can be extended when considered necessary by the airport operator to obtain a suitable response rate.”</i> Monitoring must be undertaken in accordance with the Monitoring Plans, as secured by paragraph 20(1) of Schedule 2 of the Draft DCO.</p>
TT.2.9	<p>Question:</p> <p>Framework Travel Plan Confirm how Travel Plan mode share targets, which are more ambitious than those within the Green Controlled Growth Framework, would be secured in the DCO.</p>

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	<p>Response:</p> <p>Green Controlled Growth (GCG) contains specified Surface Access Limits associated with mode share, set based on a comprehensive forecasting process and aligned with quantitative forecasts in the ES [TR020001/APP/5.01]. The Travel Plan Targets are necessarily aspirational and therefore are not set with reference to environmental effects identified by the ES [TR020001/APP/5.01]. Rather, these will be set out in each future Travel Plan in accordance with the Framework Travel Plan (FTP) [REP4-044]. This process is secured in the DCO and allows for an ongoing review and updating of targets in conjunction with key stakeholders. It is not the intention of the Applicant or is it seen as necessary to secure the realisation of these more ambitious aspirational targets, but the process by which they are set in the Travel Plan and agreed with Luton Borough Council will be secured as part of the DCO.</p> <p>Requirement 30(1) of the Draft DCO requires that notice under article 44 may not be served until a Travel Plan has been approved by the relevant planning authority, following consultation with relevant highway authorities, and that Travel Plan must be substantially in accordance with the FTP [REP4-044]. The FTP will be a certified document and provides that Travel Plan targets must include specific headline percentage targets for passenger and staff mode share to be set having regard to results of ongoing surface access monitoring and considering comments and views from key stakeholders on the level of ambition and the key targets to be set for surface access mode share.</p> <p>Requirement 30(2) requires that Travel Plans must be prepared in accordance with the process in Figure 7.1 of the FTP [REP4-044], which includes engagement with the Airport Transport Forum (ATF), Environmental Scrutiny Group (ESG) and the London Luton Airport Consultative Committee (LLACC), through which all relevant highway authorities will have an input, and final approval by the relevant planning authority.</p> <p>The application of Sustainable Transport Fund (STF) funding will be governed by the Steering Group of the ATF, which includes the relevant highway authorities as members, who will therefore have a direct role in determining what interventions are chosen to achieve the Targets identified by the Travel Plans. This will be secured through the proposed section 106 agreement, set out in the Draft Section 106 Agreement [TR020001/APP/8.167].</p>
TT.2.10	<p>Question:</p> <p>Sustainable Transport Fund (STF) In ISH7 the Applicant indicated that it is not the intention for the STF to cease when the airport reaches 32mppa, and that this would instead represent an appropriate time to review how the STF is structured. Confirm how the retention of the STF after the airport reaches 32mppa would be secured in the DCO.</p> <p>Response:</p> <p>The Applicant has addressed this in the Draft Section 106 Agreement [TR020001/APP/8.167] with a commitment added to continue to spend any remaining STF funds on sustainable transport when the airport reaches 32 mppa rather than ending the fund completely at that point.</p>
TT.2.11	<p>Question:</p> <p>STF [REP6-057] stated 'It is noted that the Applicant would consider pump priming routes to improve their commercial viability if they are shown to be the appropriate routes to improve connectivity to the airport.' Explain how the STF would have grown sufficiently to allow for pump-priming of services if contributions to the fund would not start until notice to grow (under Article 44(1)) has been served.</p> <p>Response:</p> <p>A commitment has been added to the Draft Section 106 Agreement [TR020001/APP/8.167] to address the need for pump priming in the STF. It states that the Applicant covenants that, provided the first Travel Plan (as defined in the DCO) demonstrates a need for early funding in excess of the initial revenues of the STF, it will make</p>

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	available up to £1,000,000 of pump priming funding no later than the first meeting of the ATF Steering Group, provided that the Applicant may recoup an amount equal to the pump priming contribution from the STF at a future point when it contains sufficient funds.
TT.2.12	<p>Question:</p> <p>STF At the Hearings you advised that mitigation measures required to address a breach of a GCG limit would be funded outside of the STF. Explain how this is secured in the DCO.</p> <p>Response:</p> <p>The Draft Development Consent Order [TR020001/APP/2.01] sets out under Requirement 17 of Schedule 2 that:</p> <p><i>“Mitigation Plan” means a plan which sets out—</i> <i>(a) details of the proposed mitigation and actions which are designed to remove exceedances of a Limit as soon as reasonably practicable; and</i> <i>(b) the proposed programme for the implementation of that mitigation and those actions;</i></p> <p>Under Requirement 23(9) of Schedule 2, it then goes on to state (in the context of where a Limit has been exceeded):</p> <p><i>(9) The undertaker must implement the Mitigation Plan approved by the ESG under subparagraph (5)(b).</i></p> <p>The obligation on the undertaker to implement the measures within a Mitigation Plan approved by the Environmental Scrutiny Group to address a breach of a Limit is therefore an absolute one, irrespective of funding, and failure to do so would be a breach of the terms of the Development Consent Order, which would be enforceable under Section 161 of the Planning Act 2008.</p> <p>Within the Applicant's paper on the Sustainable Transport Fund [TR020001/APP/8.119], the Applicant set out at paragraph 3.4.2(d): <i>“where a Level 2 Threshold or Limit has been breached and additional measures are required as part of a Mitigation Plan or Level 2 Plan, these should not be funded by the STF.”</i> The paper also sets out at paragraph 3.2.6 that <i>“the airport's STF is intended to be secured through a s106 agreement.”</i> It is however acknowledged that measures already approved for funding from the STF or implemented by the ATF Steering Group may contribute towards the avoidance or prevention of exceedances of a Limit.</p>
TT.2.13	<p>Question:</p> <p>Proposed off-site highway works Action Point 26 [EV14-008] stated 'Provide detail to explain why the scale of the works is required to Crawley Green Road/Wigmore Lane and Eaton Green Road to mitigate airport related traffic'. [REP6-065] provided a response which included a table presenting the AM and PM peak hours for two-way airport vehicle trips on Wigmore Lane for each of the development phases.</p> <p>To date the ExA has been supplied with limited evidence to justify the scale of the proposed off-site highways works to Crawley Green Road/Wigmore Lane and Eaton Green Road. In order to aid the ExA's understanding of the impact of airport related traffic in this area, please supply the following information:</p> <ol style="list-style-type: none"> 1. baseline flows for the AM and PM peaks each of the assessment phases for Wigmore Lane; and 2. highway capacity for Wigmore Lane.

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[REP6-065] only supplied data for Wigmore Lane. Clarify that this is because there is no airport related traffic using Crawley Green Road or Eaton Green Road or supply the equivalent data for these roads.

Response:

The table below summarises the background, airport traffic and total flows on Wigmore Lane for the AM and PM peak hours.

Peak	Direction	Trips in vehicles per hour											
		Background Trips			Existing Airport Trips			Additional Airport Trips			Total Trips		
		2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)
AM Peak	Wigmore Lane Northbound	183	278	321	14	6	28	8	49	40	205	333	389
	Wigmore Lane Southbound	563	441	453	133	136	110	80	323	423	776	900	986
	Wigmore Lane Two-way	746	719	774	147	142	138	88	372	463	981	1,233	1,375
PM Peak	Wigmore Lane Northbound	648	651	590	126	123	127	44	24	219	818	798	936
	Wigmore Lane Southbound	540	520	591	61	91	54	4	48	83	605	659	728
	Wigmore Lane Two-way	1,188	1,171	1,181	187	214	181	48	72	302	1,423	1,457	1,664

The table shows a peak total demand in the northbound direction of around 940 vehicles per hour and in the southbound direction around 990 vehicles per hour.

The ExA has requested an indication of the highway capacity of Wigmore Lane. Defining the capacity of a link can be difficult given that there are a number of factors that influence capacity. Vissim micro-simulation models do not provide a capacity estimate for roads given that the function of the network is determined though the mix of traffic and the interaction of vehicles with junctions, link speeds, vehicle headways and gap acceptance.

The Design Manual for Roads and Bridges (DMRB) (Ref 1) also provides an indication of the theoretical capacity of highway links (TA 79/99 - Traffic Capacity of Urban Roads) which suggests that the maximum theoretical capacity of such an urban link would be around 1,150 vehicles per hour per lane. Whilst the TA79/99 guidance was withdrawn in March 2020, it is yet to be formally replaced and as such is still considered appropriate to reference. Guidance is also provided in the Department for Transport document Transport Analysis Guidance (TAG) Unit M3.1 (Ref 2) which indicates in section D.4.5 that for urban roads that the maximum realistic flow should be taken as 800 vehicles per hour per lane. A comparison of the demand in the above table with the above theoretical link capacities would suggest that the demand is at the upper end of or exceeds the capacity of a single carriageway road.

However, it is important to note that the link capacity alone is not a sufficient metric when evaluating the design of a corridor. Wigmore Lane has four intersecting junctions in the space of less than 500m and, in that context, junction operation and resulting queues play a significant role in determining the design requirements to ensure stable and reliable network performance. Chapter 10 of the **Transport Assessment [APP-205]** outlines the junction performance output for individual junctions along the Wigmore Lane corridor in each assessment year. The output for Assessment Phase 2b indicates that, even with two lanes per direction, forecast maximum queue lengths along the Wigmore Lane approaches at associated junctions are in the range of 130-160m. Without the proposed widening and junction improvement mitigation works, queues would be expected

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to be much longer causing blocking back and exit-blocking, which would interfere with traffic flow at adjacent junctions and significantly impact the overall traffic flow in the network.

The works on the Wigmore Lane corridor have therefore been developed to provide additional capacity not only along the corridor but also at associated junctions. This ensures that the network can effectively accommodate the projected background traffic as well as the additional demand resulting from the Proposed Development.

The following tables show the equivalent data for Crawley Green Road and Eaton Green Road respectively.

Peak	Direction	Trips in vehicles per hour											
		Background Trips			Existing Airport Trips			Additional Airport Trips			Total Trips		
		2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)
AM Peak	Crawley Green Eastbound	785	664	704	90	66	110	11	1	75	886	731	889
	Crawley Green Westbound	236	339	345	0	31	21	0	8	4	236	378	370
	Crawley Green Two-way	1,021	1,003	1,049	90	97	131	11	9	79	1,122	1,109	1,259
PM Peak	Crawley Green Eastbound	641	638	813	47	34	34	2	15	4	690	687	851
	Crawley Green Westbound	690	679	656	19	11	62	3	10	68	712	700	786
	Crawley Green Two-way	1,331	1,317	1,410	66	45	96	5	25	72	1,402	1,387	1,578

Peak	Direction	Trips in vehicles per hour											
		Background Trips			Existing Airport Trips			Additional Airport Trips			Total Trips		
		2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)	2027 (AP1)	2039 (AP2a)	2043 (AP2b)
AM Peak	Eaton Green Eastbound*	389	509 (459)	530 (487)	22	16	35	11	148	277	422	673 (475)	842 (522)
	Eaton Green Westbound*	512	208 (514)	154 (451)	96	87	76	53	4	0	661	299 (601)	230 (527)
	Eaton Green Two-way*	901	717 (973)	684 (938)	118	103	111	64	152	277	1,083	972 (1,076)	1,072 (1,049)
PM Peak	Eaton Green Eastbound*	738	507 (829)	607 (716)	49	47	53	11	61	123	798	615 (876)	783 (769)

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	<table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width: 25%;">Eaton Green Westbound*</td> <td>460</td> <td>222 (666)</td> <td>284 (620)</td> <td>39</td> <td>12</td> <td>47</td> <td>1</td> <td>2</td> <td>165</td> <td>500</td> <td>236 (678)</td> <td>496 (667)</td> </tr> <tr> <td>Eaton Green Two-way*</td> <td>1,198</td> <td>729 (1,495)</td> <td>891 (1,336)</td> <td>88</td> <td>59</td> <td>100</td> <td>12</td> <td>63</td> <td>288</td> <td>1,298</td> <td>851 (1,554)</td> <td>1,279 (1,436)</td> </tr> </table> <p>* figures in brackets provide flows on Eaton Green Road in the absence of the Airport Access Road (AAR).</p> <p>For Crawley Green Road, the table shows that the Proposed Development is expected to add around one vehicle a minute to the demand on Crawley Green Road by Assessment Phase 2b.</p> <p>For Eaton Green Road, the table shows that in Assessment Phase 1, the Proposed Development is expected to add one vehicle a minute to the flows on Eaton Green Road. Whilst the Proposed Development will add a greater number of additional airport related trips in Assessment Phases 2a and 2b, the implementation of Airport Access Road ensures that total flows on Eaton Green Road are no worse than, and generally significantly better than in the future baseline scenarios even with the Proposed Development trips added.</p>													Eaton Green Westbound*	460	222 (666)	284 (620)	39	12	47	1	2	165	500	236 (678)	496 (667)	Eaton Green Two-way*	1,198	729 (1,495)	891 (1,336)	88	59	100	12	63	288	1,298	851 (1,554)	1,279 (1,436)
Eaton Green Westbound*	460	222 (666)	284 (620)	39	12	47	1	2	165	500	236 (678)	496 (667)																											
Eaton Green Two-way*	1,198	729 (1,495)	891 (1,336)	88	59	100	12	63	288	1,298	851 (1,554)	1,279 (1,436)																											
TT.2.14	<p>Question:</p> <p>Proposed off-site highway works Table 18.9 of Chapter 18 of the ES [AS-030] lists the East Luton highway improvements as non-airport related. The Eaton Green Road/Frank Lester Way junction is listed in this table but is also included as Works No.6e(q). Confirm if the proposed mitigation works to Eaton Green Road/Frank Lester Way junction are required for the proposed expansion? If yes, why are they listed with the East Luton highway improvements? If no, should they be included as proposed highway mitigation works?</p> <p>Response:</p> <p>This is an error within Table 18.9 of Chapter 18 of the ES [AS-030]. As detailed in Table 8.1 of Chapter 5 of the Transport Assessment [AS-123], the proposed works to the Eaton Green Road / Frank Lester Way junction are part of the Assessment Phase 2a off-site highway mitigation works (Work No. 6e(q)) and are not proposed to be delivered as part of the East Luton Study.</p> <p>Elsewhere in the ES (paragraph 18.9.62 of Chapter 18 [AS-030]), the proposed works to the Eaton Green Road / Frank Lester Way junction are correctly stated as being delivered at Assessment Phase 2a.</p> <p>A corrected version of Chapter 18 will be submitted at Deadline 8.</p>																																						
TT.2.15	<p>Question:</p> <p>Proposed off-site highway works Provide an update on the ongoing discussions regarding the proposed off-site highway works to the three junctions in Hitchin, including a roadmap to resolution.</p> <p>Response:</p> <p>As part of the work undertaken to update the transport modelling in respect of Covid-19, the Applicant has met with and provided the Hertfordshire Host Authorities with an updated assessment of the impacts on the three junctions in Hitchin.</p>																																						

PINS ID	Question / Response
	<p>The Applicant notes the Hertfordshire Host Authorities comments with regard to compliance with local policy requirements and, as has been previously set out, the Applicant's mitigations do not preclude the ability for the authorities to deliver alternative measures. The Applicant has had further discussions with the Hertfordshire Host Authorities to set out how the existing proposals could be amended to incorporate measures to support pedestrian/cycle crossings and public transport priority within the existing proposals. Discussions are on-going with the Hertfordshire Host Authorities to provide sufficient confidence on how this could be delivered through the TRIMMA process.</p>
TT.2.19	<p>Question:</p> <p>Parking Is the Applicant aware of how other airports such as Stansted, Gatwick or Heathrow manage on-street airport related parking issues. Could any of the strategies used by these airports be used for Luton and if not, why not?</p> <p>Response:</p> <p>The Applicant is aware of ways in which two of the stated airports (Stansted and Gatwick) have publicly committed to addressing this matter and has incorporated these into the strategy for the Proposed Development.</p> <p>For Stansted, the section 106 agreement for the proposed development (UTT/18/0460/FUL) committed:</p> <ul style="list-style-type: none"> • £0.2m (index linked) "to cover the reasonable costs incurred for the feasibility and design and implementation of measures to assist in the enforcement of local parking controls and restrictions in order to control fly Parking associated with the operation of Stansted Airport" → For Luton, a 'Residual Impacts Fund' is proposed to be used to fund similar activities. • To the creation of a 'Highways Working Group' "to oversee the monitoring of fly-parking associated with the airport and to 18. develop multi-agency activities to tackle identified and agreed incidences" → For Luton, the proposed ATF Steering Group will perform a similar function. <p>For the Gatwick Airport Northern Runway Project (PINS Reference Number: TR020005), the Environmental Statement contains a commitment "to provide funding for support for effective parking controls and/or monitoring on surrounding streets if considered necessary by the relevant local authority and/or support local authorities in their enforcement actions against unauthorised off-airport passenger car parking"</p> <p>For Luton, the ATF Steering Group and the Residual Impacts Fund will enable similar activities to be enacted, via the processes described in the OTRIMMA [REP5-041] which has been updated for Deadline 7.</p>
TT.2.20	<p>Question:</p> <p>Parking The Applicant's response to D3 submissions [REP4-099] included a list of staff car parking charges. These were charges payable to London Luton Airport by each operator. Please can the Applicant confirm what charges are passed on to staff for the use of each car park.</p> <p>Response:</p> <p>The airport operator does not charge any staff for parking. One of the reasons for this is to reduce the risk of staff fly parking in the local area.</p> <p>The Applicant does not have access to information on the current staff parking policies of the multitude of other private companies present on the airport campus. Such arrangement would be a matter of commercial confidentiality between the airport operator and its tenants.</p>

PINS ID	Question / Response
TT.2.21	<p>Question:</p> <p>Parking What are your proposals for monitoring the provision of off-site parking (supplied by third parties, including privately rented driveways)? How would you ensure that if lower than anticipated provision of car parking occurs in the future it can be identified and mitigated before it causes any issues such as fly-parking?</p> <p>Response:</p> <p>In recognition that the market for off-site parking is likely to increase due to the Proposed Development, the Applicant has forecast an increase in off-site parking trips due to the Proposed Development; however, the Proposed Development does not necessarily require an increase in supply to cater for this forecast because alternative options (in particular via sustainable modes) will be available if there is insufficient supply. The Applicant is therefore not proposing to monitor the provision of off-site parking (either by third party organisations or in private driveways). The Applicant does not consider that it would be appropriate to monitor the activities of private organisations or individuals, nor does it have the means to do so.</p> <p>The Applicant considers that fly-parking occurs due to a reluctance to pay for parking, rather than being the result of a lack of provision; the Applicant does not see a direct correlation between supply of off-site parking and passengers choosing to fly-park. The Applicant will, however, work with local authorities to alleviate fly parking where this is identified as being a particular problem associated with airport users; authorities can address fly-parking via use of the Residual Impact Fund – as described in the OTRIMMA [TR020001/APP/8.97]. The Applicant does not propose to seek to mitigate fly-parking before it occurs as this would suggest that residents should be subject to a parking permit parking scheme for a potential fly parking issue that might occur at an undetermined point in the future. In addition to do so would result in the unnecessary depletion of the Residual Impact Fund – some evidence of fly-parking as an ongoing issue will be required. If there is a shortfall in the supply of car parking, the Applicant anticipates that this would result in an increased propensity for passengers to use public transport.</p> <p>In the event that the overall supply of parking is considered to be insufficient, as a result of less off-site parking capacity coming forward than is assumed, the Applicant could consider the option of providing additional on-site parking and seeking planning approval to do so. However, for the reasons set out above the Applicant does not see this as a solution to passengers choosing to fly-park. A shift of modes from private car to sustainable travel is therefore preferable to increasing parking provision, and as such this would remain a key focus.</p>
TT.2.23	<p>Question:</p> <p>Cycling Confirm if staff would be charged for taking bicycles on the DART.</p> <p>Response:</p> <p>There is no charge for taking bicycles on the Luton DART.</p>

REFERENCES

Ref 1 'Design Manual for Roads and Bridges', (2020), Online.

Ref 2 Transport Analysis Guidance (TAG) Unit M3.1, (2020),

<https://www.gov.uk/government/publications/webtag-tag-unit-m3-1-highway-assignment-modelling>