

January 2024

London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

Volume 8 Additional Submissions (Examination)

**8.163 Applicant's Response to Deadline 6 Submissions Appendix G -
Dacorum Borough Council, Hertfordshire County Council and North
Hertfordshire District Council**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.163

The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.163 APPLICANT'S RESPONSE TO DEADLINE 6 SUBMISSIONS
APPENDIX G – DACORUM BOROUGH COUNCIL, HERTFORDSHIRE
COUNTY COUNCIL, NORTH HERTFORDSHIRE DISTRICT COUNCIL**

Deadline:	Deadline 7
Planning Inspectorate Scheme Reference:	TR020001
Document Reference:	TR020001/APP/8.163
Author:	Luton Rising

Version	Date	Status of Version
Issue 1	January 2024	Additional Submission – Deadline 7

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Appendix G – Dacorum Borough Council, Hertfordshire County Council, North Hertfordshire Council [REP6-097, REP6-100 & REP6-101

Table 1.1 Applicant's response to submission by Dacorum Borough Council, Hertfordshire County Council, North Hertfordshire Council [REP6-097] at Deadline 6

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
1	Surface Access	<p>Transport Modelling in the Transport Assessment</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 purpose of the daily Trip Distribution Plans is to show the overall airport trips distribution and is not intended to reflect the peak hours impacts which also includes traffic re-assignment.</p> <p>Further information with regards to traffic numbers within Hertfordshire's road network have been reported in Rule 9 modelling update final report Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159], at the request of the Hertfordshire Host Authorities. Traffic flows on Hertfordshire's road network have been added to Chapter four of the report, and further plans showing traffic flows on links were also reported and included in Appendix E.</p> <p>The latest versions of the Trip Distribution Plans [REP5-037] show the distribution within the full model simulation area. Therefore, where the bandwidths stop east of the A1(M), it is because this is the edge of the model simulation area. Potentially, this means that traffic will continue east in specific locations such as the A505 east of the A1(M) junction 9. However, within the plans, it can be seen that the bandwidths east of the A1(M) are thin which indicates that the daily airport traffic is considered low, especially when compared to the without airport expansion bandwidths. The numerical flow changes per peak are also shown in the Appendix E of the Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159].</p>
2	Surface Access	<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.</p>	<p>It is not clear whether the Hertfordshire Host Authorities refer to the base model or the future baseline models (DM).</p> <p>If the Hertfordshire Host Authorities are referring to the base year model, the approach of not adjusting the base year model was reported in the Applicant response to Rule 9 Letter [AS-064], and during the meeting held on 18th July 2023 with all Local Highway Authorities, where no concerns were raised in relation to the approach and proposed methodology.</p> <p>If the Hertfordshire Host Authorities' comment is in relation to future baseline year models, the Applicant remains of the view that the methodology adopted is robust and in line with DfT TAG guidance considering the risk associated, and the Applicant has addressed the Rule 9 requirements.</p> <p>The principles and justifications behind the adopted methodology have been reported in Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 2 Risk Assessment [REP-4-106] and within the Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159].</p> <p>The Applicant continues to discuss with the relevant Highway Authorities to seek to resolve the outstanding matters.</p>

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3	Surface Access	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.	Please see the response provided at ID 2 above. It is worth noting that since the meeting on the 12 October 2023, the Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 2 Risk Assessment [REP-4-106] was submitted at Deadline 4 (1 st November), which contained further technical information regarding the adopted approach.
4	Surface Access	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.	This information is provided in Applicant's Post Hearing Submission - Issue Specific Hearing 9 (ISH9) [REP6-067] Table 1.1 Action 32.
5	Surface Access	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 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.	<p>The distribution and assignment of passenger trips with the Proposed Development operational is based on CAA origin and destination data, as stated in the Trip Distribution section of Chapter 9 of the Transport Assessment [APP-205]. Future year trip distribution and assignment for staff, HGV and LGV trips are based on the movement patterns established from the 2016 strategic model (CBLTM-LTN) and 2017 (Vissim) base models.</p> <p>Highway Trips</p> <p>The Applicant has previously provided maps showing the distribution of staff and passenger vehicle trips associated with the airport expansion on the road network – see Trip Distribution Plans [REP5-037]. These trip distribution plans show that the A505 is the main local road network route used to travel to/from North Hertfordshire. The volumes of generated traffic using other more minor roads are very low in the three phases of the development. The total additional traffic generated by the airport expansion and using the A505 to/from Hitchin in the peak hours are summarised below:</p> <ul style="list-style-type: none"> • Up to 12 vehicles in 2027 • Up to 45 vehicles in 2039 • Up to 74 vehicles in 2043 <p>The above vehicle numbers are made up of the various trip generation components set out in Chapter 9 of the Transport Assessment including staff, passengers, LGV and HGV movements.</p> <p>Public Transport Trips</p> <p>North Hertfordshire (Hitchin, Letchworth and Royston)</p> <p>The forecast additional daily bus users (passengers and staff) travelling to/from North Hertfordshire are as follows:</p> <ul style="list-style-type: none"> • 15 in 2027 • 82 in 2039 • 130 in 2043 <p>The forecast additional daily rail users (passengers and staff) travelling to/from North Hertfordshire are as follows:</p> <ul style="list-style-type: none"> • 1 in 2027 • 15 in 2039

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			<ul style="list-style-type: none"> • 26 in 2043 <p>Stevenage The forecast additional daily bus users (passengers and staff) travelling to/from Stevenage are as follows:</p> <ul style="list-style-type: none"> • 17 in 2027 • 80 in 2039 • 121 in 2043 <p>The forecast additional daily rail users (passengers and staff) travelling to/from Stevenage are as follows:</p> <ul style="list-style-type: none"> • 1 in 2027 • 6 in 2039 • 9 in 2043 <p>Rest of Hertfordshire The forecast additional daily bus users (passengers and staff) travelling to/from the rest of Hertfordshire are as follows:</p> <ul style="list-style-type: none"> • 63 in 2027 • 282 in 2039 • 427 in 2043 <p>The forecast additional daily rail users (passengers and staff) travelling to/from the rest of Hertfordshire are as follows:</p> <ul style="list-style-type: none"> • 148 in 2027 • 756 in 2039 • 1,079 in 2043
6	Surface Access	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	<p>The Applicant has prepared the STF Terms of Use within the Draft Section 106 Agreement [TR020001/APP/8.167] with the intention of not placing onerous restrictions on how the fund is used in the future. This is to ensure that the fund's terms of use can tackle any intervention that comes forward and is considered effective in achieving the fund's aims. The initial assessment of bus services undertaken in the Bus and Coach Study [REP5-058] will be updated through the five-yearly Bus and Coach Market Study, including ongoing engagement with bus operators through the ATF and the study's preparation. Any potential intervention for sustainable transport funding should be submitted to the ATF and ATF Steering Group following notice to grow and will be considered in Bus and Coach Market Study.</p> <p>The Bus and Coach Study does not seek to provide an exhaustive list, and other interventions can be considered in the future. It instead sets out those considered most appropriate by the Applicant based on analysis of currently available travel data. The five-yearly Bus and Coach</p>

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		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.	Market Study will update this work and there will be on-going engagement with Hertfordshire Authorities through the ATF and ATF Steering Group.
7	Surface Access	<p>In addition to the above, existing service data is out-of-date as follows:</p> <p>From Luton Airport Parkway Station:</p> <ul style="list-style-type: none"> • Centrebus 366 is now demoted to operate as a school-time only service so importance has reduced. <p>From Luton Town Centre:</p> <ul style="list-style-type: none"> • No mention of Uno services 610 and X10 from Luton Interchange to Hatfield. These are both frequent services - better than every 30 minutes combined. • No mention of Centrebus 46, hourly between Luton Interchange and Hemel Hempstead via Redbourn and Markyale. • No mention of Red Eagle service 88 between Luton Interchange and Hitchin via Preston. • 721 limited stop service that operates between Luton Interchange, Harpenden, St Albans and Hemel Hempstead needs including. <p>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.</p> <p>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.</p>	<p>No specific new / improved bus services have been committed to as part of the future Travel Plan, with the initial Bus and Coach Study looking at potential routes to improve accessibility to the airport. The application of 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> <p>The increase in the value of the fund and introduction of the opportunity to pump prime interventions has been subsequently added to increase stakeholder confidence in the fund and its ability to achieve the ambitious targets to be set out in future Travel Plans. The updated Sustainable Transport Fund [TR020001/APP/8.119] and the Draft Section 106 Agreement [TR020001/APP/8.167] provide more information on the Sustainable Transport Fund.</p> <p>The 3% quoted in the Applicant's Response to Deadline 3 Submissions – Appendix H [REP4-103] represents the share of Luton airport passengers travelling by rail which are from the district of St Albans (which includes St Albans and Harpenden stations) according to the 2019 CAA data, not the forecast mode share for rail and public transport from St Albans district. This is reflective of the fact that there is a low share of total Luton Airport passengers from St Albans district (4%) and a high mode share for rail for those travelling from central London.</p>
8	Surface Access	<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>Harpenden to Luton is also identified as a key prioritised route in England's Economic Heartlands (EEH) Active Travel Strategy</p> <p>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</p>	<p>Noted. As members of the Airport Transport Forum, local highway authorities will be able to submit sustainable transport interventions to be considered for funding from the Sustainable Transport Fund. This includes walking and cycling improvements that are related to the development.</p> <p>The application of 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.</p>

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		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.	
9	Surface Access	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 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>The increase in the value of the fund and introduction of the opportunity to pump prime interventions has been subsequently added to increase stakeholder confidence in the fund and its ability to achieve the ambitious targets to be set out in future Travel Plans.</p> <p>Refer to the Applicant's Deadline7 submission the updated Sustainable Transport Fund [TR020001/APP/8.119].</p>
10	Surface Access	<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>	Further details on the indicative terms of use will be subject to engagement with authorities and will be contained in the updated version of the OTRIMMA to be submitted at Deadline 7 [TR020001/APP/8.97] .
11	Surface Access	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. 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.	The Applicant is considering its position regarding the end of the fund. This will be addressed in the Draft Section 106 Agreement [TR020001/APP/8.167] submitted at Deadline 7 with the local and strategic planning authorities, with a commitment added to continue to spend any remaining STF funds on sustainable transport when the airport reaches 32mppa rather than ending the fund completely at that point.
12	Surface Access	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	The GCG Framework [TR020001/APP/7.08] contains specified Surface Access Limits associated with mode share, aligned with quantitative forecasts utilised by the Environmental Impact Assessment and Transport Assessment [TR020001/APP/7.02] . The Travel Plan targets

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		<p>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>	<p>are necessarily aspirational and therefore are not set with reference to environmental effects identified by the Environmental Statement [AS-030]. Rather, these will be set out in each future Travel Plan in accordance with the with the Framework Travel Plan (FTP) [REP4-044]. This process is secured in the Draft DCO and allows for an ongoing review and updating of targets in conjunction with key stakeholders.</p> <p>Paragraph 30 of Schedule 2 to the Draft DCO [TR020001/APP/2.01] 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. The FTP will be a certified document and provides that Travel Plan targets must include specific headline % 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>Paragraph 30 of Schedule 2 requires that Travel Plans must be prepared in accordance with the process in figure 7.1 of the FTP, which includes engagement with the ATF, Environmental Scrutiny Group (ESG) and London Luton Airport Consultative Committee (LLACC), through which all relevant highway authorities will have an input, and final approval will be by the relevant planning authority.</p> <p>The application of 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 s106 agreement, as set out in the Draft Section 106 Agreement [TR020001/APP/8.167].</p>
13	Surface Access	<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 	<p>Please refer to section 3.3 of the OTRIMMA [TR020001/APP/8.97] submitted at D7.</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 which was used to inform the design of off-site highway mitigation proposals. The Applicant agrees that the market for off-site parking will increase (and has therefore allowed for such an increase in the design of off-site highway works), and, for the purpose of modelling, has assumed that the locations would broadly follow the current geographic distribution.</p> <p>The passenger private vehicles entering/exiting an off-site car park will not be monitored as part of the TRIMMA as these sites are privately managed. 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>

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		<p>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.</p> <p>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.</p> <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>																									
14	Surface Access	<p>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.</p>	<p>The Proposed Development assumes that off-site car parking would remain one of the available access options in the future with the expanded airport. This is shown in Table 9.5 of the Transport Assessment [APP-205] where the forecast future mode split assumptions for the transport modelling are set out. It is assumed that the off-site car parking mode share for the expanded airport would be 5.2% in 2027, and 5% in 2039 and 2043.</p> <p>The Transport Assessment does not set out the number of off-site car parking spaces inferred by the mode share, as off-site car parking is not within the control of the Applicant. Nevertheless, the assumed provision of off-site parking for each phase is shown in the table below.</p> <table border="1" data-bbox="1486 1213 2614 1591"> <thead> <tr> <th rowspan="2"></th> <th colspan="4">Year</th> </tr> <tr> <th>2019 Baseline</th> <th>2027 Phase 1</th> <th>2039 Phase 2a</th> <th>2043 Phase 2b</th> </tr> </thead> <tbody> <tr> <td></td> <td>18mppa</td> <td>21.5mppa</td> <td>27mppa</td> <td>32mppa</td> </tr> <tr> <td>Total off-site car parking</td> <td>6,800</td> <td>7,480</td> <td>9,520</td> <td>10,880</td> </tr> <tr> <td>Additional off-site parking requirement compared to 2019 Baseline</td> <td>-</td> <td>+680</td> <td>+2,720</td> <td>+4,080</td> </tr> </tbody> </table> <p>Compared to the 2019 baseline, it is assumed that an additional 680 off-site car parking spaces would be provided for Phase 1, an additional 2,720 spaces for Phase 2a and an extra 4,080 spaces for Phase 2b.</p>		Year				2019 Baseline	2027 Phase 1	2039 Phase 2a	2043 Phase 2b		18mppa	21.5mppa	27mppa	32mppa	Total off-site car parking	6,800	7,480	9,520	10,880	Additional off-site parking requirement compared to 2019 Baseline	-	+680	+2,720	+4,080
	Year																										
	2019 Baseline	2027 Phase 1	2039 Phase 2a	2043 Phase 2b																							
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15	Surface Access	<p>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.</p>	<p>The Transport Assessment [APP-205] has not assumed a baseline allowance or assessed private individuals renting their driveway to air passengers, as these are not the responsibility of the Applicant. In addition, the number of parking spaces available via rented driveways would in any case be insignificant compared to the amount of car parking available on-site and at the third-party off-site car parks.</p>																								

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			<p>No baseline allowance has been assumed for on-street (fly-parking). However, the Applicant recognises the potential for fly-parking and has undertaken discussions with Local Highway Authorities about fly-parking associated with airport users. Measures such as parking controls can be delivered as a means of mitigating such issues, as described in the OTRIMMA [REP5-041]- including the updated version submitted at Deadline 7 [TR020001/APP/8.97].</p>
16	Surface Access	<p>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 Applicants 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].</p>	<p>The mitigation has been designed to address the main impacts of the Proposed Development which in these locations relate to additional vehicle trips. The Applicant notes the Hertfordshire Host Authorities comments with regard to compliance with Hertfordshire Local Transport Plan and the North Central Hertfordshire Growth and Transport Plan and, as has been previously set out in section 3 of the OTRIMMA [REP5-041], the Applicant's mitigations do not preclude the ability for the authorities to deliver alternative measures.</p> <p>As part of the detailed design, the currently proposed designs could incorporate measures to support pedestrian/cycle crossings and public transport priority within the existing proposals, and discussions have been held with the authorities on how this could be achieved.</p> <p>It is noted that the OTRIMMA [TR020001/APP/8.97] allows for refinement to proposed mitigations.</p>
17	Surface Access	<p>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 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>This is incorrect. The modelling within the Transport Assessment [APP-205] is informed by the CBLTM-LTN strategic modelling. One of the main benefits of using the strategic modelling is that it does take account of dynamic reassignment. The Rule 9 report submission made by the Applicant to the ExA on 15 December 2023 included the updated Covid-19 modelling.</p>
		<p>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>Please refer to the response provided at ID 8 in the Applicant's Response to Deadline 5 Submissions Appendix D - Dacorum Borough Council, Hertfordshire County Council and North Hertfordshire Council [REP6-057].</p>
18	Surface Access	<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 	<p>Comments are noted.</p> <p>It is incorrect to state that the approach is based on a predict and provide. As set out in Section 8 of the Transport Assessment [AS-123], the main priorities are to achieve greater use of public transport by air passengers and staff, and to make the best use of existing highways</p>

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		<p>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.”</p> <ul style="list-style-type: none"> • 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: • “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').” • This is referenced by Active Travel England Standing Advice Note: Active travel and sustainable development (October 2023) in paragraph 1.6. • 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>infrastructure, providing improvements to mitigate any identified airport expansion impacts. The Application has set out to meet the anticipated growth in demand for travel by seeking to increase sustainable transport modal share. However, it is recognised that there will still be an increase in car related travel and as such some highway infrastructure will need to be provided and these measures have included improvements to junctions in Hitchin.</p> <p>As the Applicant has set out in the response provided at ID 16, the mitigation has been designed to address the main impacts of the scheme Proposed Development which in these locations relate to additional vehicle trips. The Applicant notes the Hertfordshire Host Authorities comments with regard to compliance with Hertfordshire Local Transport Plan and the North Central Hertfordshire Growth and Transport Plan and, as has been previously set out, the Applicant's mitigations do not preclude the ability for the authorities to deliver alternative measures.</p> <p>The Applicant has also discussed with the Hertfordshire Host Authorities how the currently proposed designs could incorporate measures to support pedestrian/cycle crossings and public transport priority within the existing proposals.</p>
19	Surface Access	<p>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>Please refer to the response provided at ID 16.</p> <p>The Applicant does not consider the cost estimates for the individual schemes to be a matter for the Hertfordshire Host Authorities. The Applicant is committed to delivering the Proposed Development in accordance with the DCO plans or as agreed through any amendments to the design.</p>
20	Surface Access	<p>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</p>	<p>Traffic models have been informed by forecast flows from the strategic model (namely the CBLTM-LTN model,) which takes account not only of growth but also of dynamic reassignment. The forecast CBLTM-LTN models have been developed from calibrated and validated base models.</p>

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		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.	The CBLTM-LTN model is a multimodal model and considers trip demand for all modes. Airport related trip demand has been derived from passenger and staff data and taking into account all modes. As set out in Section 8 of the Transport Assessment [AS-123] , the main priorities are to achieve greater use of public transport by air passengers and staff, and to make the best use of existing highways infrastructure, providing improvements to mitigate any identified airport expansion impacts. The Application has set out to meet the anticipated growth in demand for travel by seeking to increase sustainable transport modal share. However, it is recognised that there will still be an increase in car related travel and as such some highway infrastructure will need to be provided and these measures have included improvements to junctions in Hitchin. The Applicant disagrees that providing increased vehicle capacity in these locations would have an adverse impact on the surrounding villages and in fact, by not mitigating the additional vehicular demand, there would be a greater risk of traffic using alternative routes including through the villages.
21	Surface Access	<p>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.</p> <p>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.</p>	Noted. Discussions are on-going with Hertfordshire and North Herts Council on these locations. The Applicant does not see a need to change the cost cap approach set out in the OTRIMMA but has proposals for an alternative approach to the provision of mitigation at these locations. The next meeting with Hertfordshire and North Herts Council is planned for 11 January 2024.
22	Surface Access	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).	Please refer to the response provided at ID 13.
23	Surface Access	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.	The Applicant considers it unreasonable to stipulate that monitoring never ceases, as to do so would require disproportionate action and cost in a case when the airport was no longer having an unmitigated impact on the public highway. The proposal to continue monitoring for a period of five years is intended to address changes in traffic in the five-year period since the airport is observed to have stopped growing.

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24	Surface Access	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.	<p>The Applicant is happy to discuss the other sites but as no impacts were established in the Transport Assessment that required mitigation, these would be subject to the process set out in the OTRIMMA [TR020001/APP/8.97] for mitigation type 2.</p> <p>However, it is worth noting that the airport expansion forecast impact at these locations are either insignificant in 2027 Phase 1 or have a significant reduction of traffic in Phase 2a and Phase 2b due to the re-assigned traffic from the local roads onto the M1 via junction 10. This can be seen in all reported flow differences plots in:</p> <ul style="list-style-type: none"> • Strategic Modelling Forecasting Report (Transport Assessment Appendices - Part 2 of 3 (Appendix F) [APP-201]), • Technical Note 2 Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 2 Risk Assessment [REP-4-106] • Rule 9 Modelling update final report Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159].
25	Surface Access	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").	The Transport Assessment [APP-205] identified small increases in traffic on some local roads and as such, there is a less than high probability of need for any interventions. Nevertheless, given that there is a small impact, and at some time in the future, a precautionary approach has been taken in including within the TRIMMA monitoring which would enable the implementation of traffic management measures if required. The locations shown for traffic management are indicative and in the event that measures are required these would be developed through the monitoring approaches which would enable a more holistic view on the package of measures required at that time.
26	Surface Access	<p>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:</p> <p>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);</p> <p>b. the Active Travel Forum (ATF) agreeing to fund those additional measures.</p>	The Transport Assessment [APP-205] has determined where mitigation is required, and the proposed works to mitigate these impacts are secured as identified works at Schedule 1 of the Draft DCO and delivered as MT1 mitigations by the OTRIMMA [TR020001/APP/8.97] . This is wholly consistent with any major planning scheme and there is no reason to consider that these should be ineffective in mitigating the impacts of the Proposed Development. The Applicant is offering the RIF as an additional sum in recognition of the long-term nature of the Proposed Development to allow unforeseen effects on the highway network to be mitigated. It is very unusual for major planning development to offer such a fund. Please note that it is the Airport Transport Forum (ATF) that agree funding.
27	Surface Access	<p>Post hearing note on Residual Impact Fund (RIF):</p> <p>This is allocated on a max per year per authority (for monitoring and mitigation)</p> <p>The Hertfordshire Host Authorities are seeking clarity on:</p> <ol style="list-style-type: none"> 1) The total value of funding (even as an approximate range). 2) How funding is proposed to be distributed by year and local authority. 3) Whether district authorities will have a funding allocation or only highway/transport authorities. 4) Whether underspent money will be rolled over indefinitely or clawed back. 5) 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) 	<p>An updated version of the OTRIMMA [TR020001/APP/8.97] is submitted at Deadline 7 and will contain a draft terms of use for the RIF. In response to each question:</p> <ol style="list-style-type: none"> 1. The value of the fund will be stated in the Draft Section 106 Agreement [TR020001/APP/8.167] submitted at Deadline 7. 2. There is currently no proposal to distribute funding by year or by authority – funds will be made available when and where the ATF Steering Group decides. 3. Please refer to the Deadline 7 version of the OTRIMMA. 4. Please refer to the Deadline 7 version of the OTRIMMA. 5. Please refer to the Deadline 7 version of the OTRIMMA. 6. Please refer to the Deadline 7 version of the OTRIMMA. 7. The RIF will be independent of GCG.

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		<p>and distribution between LAs (e.g. if impacts are measurably greater in one local authority area than its portion of the RIF).</p> <p>6) 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.</p> <p>7) 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.</p>	

Table 1.2 Applicant's response to submission by Dacorum Borough Council, Hertfordshire County Council, North Hertfordshire Council [REP6-100] at Deadline 6

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
1	Landscape and Visual Impact	<p>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?</p>	<p>The 2m high noise barrier between the Holiday Inn and Preservation House would be located on the new bridge over Airport Way where a balustrade was previously proposed, as illustrated in Representative Viewpoint 53 of ES Appendix 14.7 [REP3-014]. The barrier would be visible in proximate views to the northeast of the bridge (notably from Airport Way and New Airport Way) and be seen in the urban context of Luton. It is unlikely that the barrier would be visible from any Assessment Viewpoints in Dacorum Borough Council, Hertfordshire County Council and North Hertfordshire Council due to the presence of existing and proposed intervening built form and vegetation. The inclusion of the noise barrier in the location proposed would not affect the findings and conclusions of Chapter 14 of the ES [AS-079].</p>
2	Design and Landscape	<p>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.</p>	<p>In relation to design principles please refer to Applicant's Response to Written Questions – Physical effects of development and operation [TR020001/APP/8.152].</p> <p>Section 3 of the Design Principles [REP5-034] and updated in the latest version of the Design Principles submitted at Deadline 7 [TR020001/APP/7.09], signposts the reader to the Strategic Landscape Masterplan [APP-172] (SLMP). It is intended that Section 3 of the Design Principles should be read in conjunction with the SLMP which provides additional information on the landscape design approach. The SLMP is the appropriate document for setting out this information, rather than the LVIA provided in Chapter 14 of the ES [AS-079].</p> <p>The Applicant considers that it is not necessary for the Design Principles to address building massing and heights as these are controlled by the parameters which have been assessed in the LVIA. The introduction of the Design Principles [TR020001/APP/7.09] issued at Deadline 7 has been updated to refer to the parameters. See also response provided at ID4, below.</p>

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3	Surface Access	<p>Figures 1 – 28 – Trip Distribution Plans</p> <p>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.</p>	<p>This amendment has been made in the latest version of the Trip Distribution Plans submitted at Deadline 5 [TR020001].</p>
4	Design Landscape and Visual	<p>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.</p> <p>More detail on design intent is required to understand what is 'appropriate' 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.</p>	<p>.</p> <p>The revised version of the Design Principles issued at Deadline 7 [TR020001/APP/7.09] now includes indicative visuals which show the proposed development in the context of the existing airport site and adjacent areas which indicate horizontal and vertical mass/size.</p> <p>Details such as roof lines, colour palette etc. will be addressed at detailed design stage but the Design Principles [TR020001/APP/7.09] sets expectations for such matters.</p>
5	Design and Landscape	<p>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].</p>	<p>In relation to design principles refer to Applicant's Response to Written Questions – Physical effects of development and operation [TR020001/APP/8.152].</p> <p>In relation to design review refer to response in Applicant's Response to Written Questions – Action Points Arising from Hearings [TR020001/APP/8.146] and the revised version of the Design Principles to be issued at Deadline 7 [TR020001/APP/7.09].</p> <p>A new paragraph 5(7) has been inserted in Schedule 2 of the draft DCO submitted at Deadline 7 [TR020001/APP/2.01] which commits the undertaker to providing the specified authorities with an expected programme of works for the initial five-year period and, on a five year basis thereafter.</p>
6	Design and Landscape	<p>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.</p>	<p>The Strategic Landscape Masterplan [APP-172] and Section 14.8 of the ES [AS-079] include commentary on how soft landscaping principles have evolved to respond to and retain key landscape elements and features.</p>
7	Design and Landscape	<p>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.</p> <p>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</p>	<p>The updated Design Principles provided at Deadline 7 [TR020001/APP/7.09] now includes indicative visuals which show the Proposed Development in the context of the existing airport site and adjacent areas which indicate horizontal and vertical mass/size.</p> <p>Details such as roof lines, colour palette etc. will be addressed at detailed design stage but the Design Principles [TR020001/APP/7.09] sets expectations for such matters.</p> <p>The design vision and evolution are set out in Chapters 3 and 4 of the Design and Access Statement [AS-049]. Through the design evolution and Sift process (starting at Sift 1) the</p>

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		<p>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.</p>	<p>locally and nationally designated landscape areas have informed the appraisal of options as described within paragraph 3.29 and table 4.1 within Design and Access Statement Appendix B Part 1 of 4 [APP 209].</p> <p>At Sift 2 and Sift 3 the Sift Criteria for Landscape and visual impact and environmental land use are described with in table 3.1 of Design and Access Statement Appendix B Part 2 and 3 of 4 [APP-210, 211] included ten sift sub criteria including, “Does this option impact, protect or enhance designated landscapes or townscapes?”, “Does the option affect the character of the landscape/townscape or the perceptual characteristics of surrounding landscape/townscape character areas?” and “To what extent can effects on landscape or visual amenity be managed and mitigated?” The results of the options appraisal are set out in Table 5.14 [APP 210] and Table A.14 [APP-211].</p> <p>In relation to design principles refer to Applicant’s Response to Written Questions – Physical effects of development and operation [TR020001/APP/8.152].</p>
8a	Surface Access	<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>This is noted and discussions are on-going regarding the mitigation at these junctions.</p>
8	Surface Access	<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. • 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 	<p>As previously noted within Applicant’s Response to Issue Specific Hearing 4 Action 8: Off-site Highway Works [REP4-082], there are no base traffic counts available at the three Hitchin junctions. These Existing Junctions ‘with Proposed Development’ scenarios are modelled using traffic flows extracted from the CBLTN-LTN Proposed Mitigation ‘with Proposed Development’ strategic model runs, as for reasons explained in [REP4-082] no strategic model run is available for the existing highway network ‘with Proposed Development’ traffic flows. As such, for the analysis of the Existing Junctions ‘with Proposed Development’ modelled scenarios, traffic flows were taken from the Proposed Mitigation ‘with Proposed Development’ strategic model run.</p> <p>Whilst it is not possible to undertake a traffic survey or provide additional model validation at present due to the short timeframes involved, the Applicant would continue to engage with NHDC and HCC in developing highway schemes which are considered suitable for all parties, and this would potentially include updated traffic modelling as part of the detailed design process.</p> <p>It is not correct to state that the modelling does not reflect Covid-19 updates, as the flows extracted from the strategic modelling were taken from the updated Rule 9 model runs.</p> <p>Wratten Road is the minor arm on the 4-arm A505/Pirton Road mini-roundabout. This minor arm serves a residential area which also has an access (two way) and an exit onto Willow Lane. The estate includes houses/bungalows, low rise flats and retirement apartments. Since</p>

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		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.	most of the houses (higher trip generators) are closer to the Willow Lane access, which would be more attractive for traffic travelling to Luton, Stevenage and into Hitchin, it is likely that use of Wratten Road would be low. As a result, a nominal peak hour trip generation of 15 PCUs was assumed on Wratten Road. This figure was used in both the Future Baseline and the With Development scenarios to establish the impact of the Proposed Development. Surveying the flow on the minor arm is unlikely to make any difference to the modelling conclusions.
9	Surface Access	<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>	The Applicant has set out mitigation proposals that mitigate the impacts identified by the Transport Assessment. It has been discussed that traffic impacts on villages identified in the Transport Assessment as potentially being impacted will be monitored as part of the TRIMMA process. As previously mentioned, discussions are on-going regarding the mitigation at the junctions in Hitchin.
10	Surface Access	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.	Locations for additional monitoring will be discussed with the Hertfordshire Host Authorities though it should be noted that only locations where a clear impact from the Proposed Development has been established through the Transport Assessment will be considered. Meetings are planned for January 2024 where this will be discussed.
11	Surface Access	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]. 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>The Applicant reiterates that the purpose of the daily Trip Distribution Plans is to show the overall airport trips distribution, and it is not intended to reflect the peak hours impacts which also include traffic re-assignment.</p> <p>Further information with regards to traffic numbers within Hertfordshire's road network have been reported in Rule 9 modelling update final report Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159], at the request of the Hertfordshire Host Authorities and their consultant.</p> <p>Traffic flows on Hertfordshire's road network have been added to Chapter four of the report, and further plans showing traffic flows on links were also reported and included in Appendix E. A further meeting is being arranged for early January 2024 to discuss the final modelling report.</p>
12	Green Controlled Growth	<p>Green Controlled Growth Framework (GCGF) (Air Quality)</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</p>	There are no proposals to notify any of the Host Authorities in the event of the near-real time monitoring data providing an 'early warning' that there is a risk of a Limit of Threshold being exceeded in future. Similarly, there is no obligation on the airport operator to have to take action in these circumstances (as no Limit or Threshold has been exceeded). The use of this data is a management tool for the airport operator to help them remain within the Limits and Thresholds in future. As stated previously and described in Green Controlled Growth Appendix D - Air Quality Monitoring Plan [TR020001/APP/7.08] , the data will be made

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		Hertfordshire Host Authorities would wish to receive a report in a timely manner, detailing the circumstances and any action taken.	open source and freely available should any Authority or other interested party wish to view it.
13	Green Controlled Growth	<p>Green Controlled Growth Framework (GCGF) (Air Quality)</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>	As noted in the Applicant's Post Hearing Submission – Issue Specific Hearing 8 [REP6-066] boundary monitoring is planned to be carried out by the airport operator and will be reported in the annual monitoring reports, however the data will not form part of the formal GCG sites and is for information only. The boundary monitoring is at the airport operator's discretion and not part of GCG.
15	Surface Access	<p>Surface Access Modelling</p> <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</p>	A response to this matter was provided in Applicant's Response to Deadline 5 Submissions Appendix D - Dacorum Borough Council, Hertfordshire County Council and North Hertfordshire Council [REP6-057] .
16	Surface Access	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.	<p>The Applicant does not recognise the reference made to Site 372. The Applicant used Site 371 (B653 between Bower Heat and East Hyde). The peak hour analysis reported in the Trends Analysis was for April, as included in the title of Figure 18 of the Technical Note 1 Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 1 [REP4-084].</p> <p>Within the Trends Analysis and as reported in Technical Note 1, the Applicant used consistent month for each site individually when comparing peak hour flows to compare between years, i.e. Site 128 used October whereas Site 371 used April. This was due to data availability. The month used was annotated within the associated graphs.</p> <p>The Applicant is not aware of any other reasons for the traffic reduction.</p>
17	Surface Access	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.	Please refer to the response provided at ID 15.
18	Surface Access	<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>The meeting held with relevant Highway Authorities including the Hertfordshire Host Authorities on 12th October 2023 was to discuss the initial finding of the Rule 9 modelling update and the risk assessment.</p> <p>It is worth noting that since the meeting on the 12 October 2023, the Technical Note 2 Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 2 Risk Assessment [REP-4-106] was submitted at Deadline 4 (1st November), which contained further technical information regarding the adopted approach.</p> <p>The Applicant is of the view that the methodology adopted remains robust and in line with Department for Transport TAG guidance considering the risk associated and have addressed the Rule 9 requirements.</p>

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		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.	The principles and justifications behind the adopted methodology have been reported in Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 2 Risk Assessment [REP-4-106] and within the Final Report Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159] .
19	Surface Access	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.	The Applicant has provided information and comparison between NTEM v7.2 and NTEM v8 for both National and Local levels. This was initially reported in Technical Note 1 Applicant's Response to Issue Specific Hearing 4 Action 2: Covid 19 Additional Modelling Technical Note 1 [APP-REP4-084] , and also included in the Rule 9 modelling update final report Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159] .
20	Surface Access	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.	The Applicant provided a response to this matter in 8.127 Applicant's Response to Deadline 5 Submissions Appendix D - Dacorum Borough Council, Hertfordshire County Council and North Hertfordshire Council [REP6-057] .
21	Surface Access	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.	In document 8.127 Applicant's Response to Deadline 5 Submissions Appendix D - Dacorum Borough Council, Hertfordshire County Council and North Hertfordshire Council [REP6-057] , the Applicant reported further information about both bus and rail trends. This is reported now in Chapter 3 of the Rule 9 modelling update final report Applicant's Response to Issue Specific Hearing 7 Action 2 - Accounting for Covid-19 in Transport Modelling Final Report [AS-159] .
22	Surface Access	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.	The Applicant notes the Hertfordshire Host Authorities comments with regard to compliance with local policy requirements and, as has been previously set out, the Applicants mitigations do not preclude the ability for the authorities to deliver alternative measures. As part of the detailed design, the currently proposed designs could include incorporation of measures to support pedestrian/cycle crossings and public transport priority within the existing proposals and, discussions have been held with the authorities on how this could be achieved.
23	Surface Access	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.	The Applicant is not defining any specific values at this stage. However, the increase in the value of the fund and introduction of the opportunity to pump prime interventions has been subsequently added to increase stakeholder confidence in the fund and its ability to achieve the ambitious targets to be set out in future Travel Plans. The updated STF Topic Paper [TR020001/APP/8.119] and Draft Section 106 Agreement [TR020001/APP/8.167] provide more information on the revised value and pump priming of the Sustainable Transport Fund. 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

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
		<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>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 as set out in the Draft Section 106 Agreement [TR020001/APP/8.167].</p>
24	Surface Access	<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) "The feasibility of this approach is under consideration". The Hertfordshire Host Authorities consider that the funding for early public transport (bus and coach) service intervention is essential.</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 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 STF revenues.</p>
25	Surface Access	<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>The Applicant is considering its position regarding the end of the fund. This will be addressed 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 32mppa rather than ending the fund completely at that point.</p>
26	Surface Access	<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>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 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 STF revenues.</p>
27	Surface Access	<p>Regarding the Framework Travel Plan (Tracked Change Version) [REP4- 045], the tables in the 'Toolbox of Interventions' demonstrate that there will 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>	<p>The increase in the value of the fund and introduction of the opportunity to pump prime interventions has been subsequently added to increase stakeholder confidence in the fund and its ability to achieve the ambitious targets to be set out in future Travel Plans. The updated Sustainable Transport Fund Paper [TR020001/APP/8.119] and Draft Section 106 Agreement [TR020001/APP/8.167] provide more information on the Sustainable Transport Fund.</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, as set out in the Draft Section 106 Agreement [TR020001/APP/8.167].</p>

Table 1.3 Applicant's response to submission by Dacorum Borough Council, Hertfordshire County Council, North Hertfordshire Council [REP6-101] at Deadline 6

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
1	Design	<p>The Hertfordshire Host Authorities maintain their support for the addition of a requirement for a post-consent detailed Masterplan to be developed, consulted on and approved, and suggests that the requirement should be crafted for that masterplan to be subject to regular review to reflect delivery uncertainty, particularly given the substantially increased scale now proposed.</p> <p>A wide range of stakeholders and communities would benefit from a process through which the operator regularly updates and consults upon, in a phased fashion (every five years), it's intentions to deploy the strategic masterplan contained within the DCO – e.g. terminal timing and indicative design, next tranche of infrastructure improvements or proposed alternatives in light of changed circumstances, etc.</p> <p>The Hertfordshire Host Authorities note the Applicant's reluctance to comply with Policy LLP6B(iii) in the Applicant's Response to Written Questions – Design [REP4-061] and in the Applicant's Comments on Responses to Written Questions by Interested Parties [REP5-052] and continued resistance at ISH 8.</p>	<p>A new paragraph 5(7) has been inserted in Schedule 2 of the Draft DCO submitted at Deadline 7 [TR020001/APP/2.01] which commits the undertaker to providing the specified authorities with an expected programme of works for the initial five-year period and, on a five-year basis thereafter.</p>
2	Design	<p>With regard to an independent design review, the Hertfordshire Host Authorities disagree with the Applicant's concerns that an independent design review risks further complicating the already complex engagement needed to reach agreement during detailed design stage. The Hertfordshire Host Authorities assert that the complex nature of the development is a strong reason for both a masterplan and independent design panel review (albeit perhaps in relation to certain key aspects of the development – for example, the terminal).</p>	<p>Refer to response in Applicant's Response to November Hearing Actions (CAH2 and ISH7-10) [TR020001/APP/8.165] ISH8 – AP53 and the revised version of the Design Principles to submitted at Deadline 7 [TR020001/APP/7.09]. .</p>
3	Landscape and Visual	<p>'Magnitude of impact' is considered acceptable wording. The resulting 'Effect', as well as 'Significance of that Effect', are also considered acceptable wording. It is therefore unclear why the Applicant refers to 'Significance of Impact' at Paragraph 5.7 of Appendix 14.1 LVIA Methodology [AS-036], similarly on pp29 of Chapter 14 Landscape and Visual Revision 1 [AS-079]. This clearly conflates 'impact' and 'effect'. Chapter 5 Approach to the Assessment [AS-075] clearly separates the two.</p>	<p>The Heading for Section 5.7 of Appendix 14.1 should say 'Significance of Effect' instead of 'Significance of Impact', the Applicant will correct this.</p>
4	Landscape and Visual	<p>In response to the Applicant's reference to GLVIA3 allowing variation:</p> <ul style="list-style-type: none"> The Applicant states that the LVIA methodology relating to 'Magnitude of impact' follows Chapter 5 Approach to the Assessment of the Environmental Statement (ES) [AS-075, paragraph 5.4.40]. Chapter 5 Approach to the Assessment of the ES [AS-075] defines 'Magnitude of Change', not 'Impact'. The LVIA methodology is therefore neither following the terminology set out in Chapter 5 Approach to the Assessment of the ES [AS-075] nor GLVIA3. As such, item (1) is not complied with. 	<p>It is acknowledged that GLVIA3 recognises a clear distinction between 'impact,' and 'effect. For consistency with other chapters of the ES, the LVIA varies from this advice and refers to 'magnitude of impact,' even when describing a combination of several effects. This variance does not compromise the assessment which remains robust and follows required principles to assess significance of effects.</p> <p>The approach to assessing the Magnitude of Impacts on landscape receptors is set out in Section 5.6 of Appendix 14.1 of the ES [AS-036]. The approach to assessing the Magnitude of Impacts on visual receptors is set out in Section 6.5 of Appendix 14.1 of the ES.</p>

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
		<ul style="list-style-type: none"> • The Applicant has not undertaken item (2). The use of 'impact' and 'effect' are not used consistently, nor do they follow the conventions in Chapter 5 Approach to the Assessment of the ES [AS-075]. • The Hertfordshire Host Authorities therefore request again that consistency of terminology is used with no conflation of 'impact' and 'effect' in either Chapter 14 Landscape and Visual Revision 1 [AS-079], Appendix 14.1 LVIA Methodology [AS-036], or Chapter 5 Approach to the Assessment [AS-075] of the ES. • Item (3) is also not complied with. The Applicant's response has merely listed factors that inform Magnitude (which combine to form the level of Impact / Change). They have not defined anywhere how or why they are proposing to combine the various 'effects' (derived by a combination of Magnitude of Impact / Change and Sensitivity) to inform the Magnitude of Impact. Such a combining of 'Effects' to inform a 'Magnitude of Impact / Change' level is not described anywhere in Chapter 5 Approach to the Assessment [AS-075] nor Chapter 14 Landscape and Visual Revision 1 of the ES [AS-079] and is not standard practice. • The Hertfordshire Host Authorities again request that consistency of terminology is used with no conflagration of 'impact', 'change' and 'effect' 	
5	Landscape and Visual	<p>The Hertfordshire Host Authorities are not in agreement with the findings of Appendix 14.9 Chilterns AONB Sensitivity Test of the ES [APP-107]. Visual sensitivity includes perceptual qualities, and a receptor (including tourists or visitors) within a designated landscape (AONB) would expect to experience the Special Qualities associated with that designation. They therefore have a higher expectation of the quality of the views experienced in an AONB than in a non-designated landscape i.e. the value of the view increases -the quality of the landscape within an AONB, including its management, dark skies and perceptual qualities, are expected to be maintained and preserved in order to maintain its outstanding natural beauty. The Hertfordshire Host Authorities therefore disagree with the assessment relating to Sensitivity.</p> <p>The Hertfordshire Host Authorities welcome consideration of changes to magnitude of impact on the AONB extension area as outlined in Section 2.3 of the Appendix 14.9 Chilterns AONB Sensitivity Test of the ES [APP-107]. However, it strongly disagrees with the suggestion that the AONB extension would only result in a Magnitude of 'low', given that the AONB boundary would be brought within metres of the Proposed Development boundary rather than 3km distant. Paragraph 2.3.2 of Appendix 14.9 Chilterns AONB Sensitivity Test of the ES [APP-107] only identifies aircraft movements as contributing to operational impacts. This is highly deficient. Given the proximity of the AONB extension area to the Proposed Development, aesthetic and perceptual qualities would be strongly influenced by a wide range of factors such as increased concentration of vehicles on and off-site (including headlights of both public and private vehicles as well as airport-related operational vehicles). This also includes increased concentration of vehicles accessing the site</p>	<p>The Applicant notes that the AONB Sensitivity Test in Appendix 14.9 of the ES [APP-107] is considered to be in accordance with GLVIA3 for the reasons set out in the Applicant's Post Hearing Submission ISH8 [REP6-066].</p> <p>The Applicant has responded to the second element of the Hertfordshire Host Authorities' response in the following documents:</p> <ul style="list-style-type: none"> • Applicant's Post Hearing Submission - Issue Specific Hearing 8 (ISH8) [REP6-066]. • TR020001/APP/8.130 Written Question Responses - Applicant's Response to Hertfordshire Host Authorities' Comments December 2023. <p>The effects of additional vehicles, headlights, number of people etc. on the aesthetic and perceptual qualities of the potential AONB extension area cannot be meaningfully modelled or quantified. The Sensitivity Test has had regard to additional aircraft movements over the potential AONB extension area and, based on the methodology set out in Chapter 14 of the ES [AS-079], is considered to adequately assess the aesthetic and perceptual qualities of the AONB extension area.</p>

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
		<p>through the AONB; increased activity from increased numbers of people on-site; direct intervisibility between London Luton Airport and the AONB including nighttime lighting impacting on dark skies and the aesthetic and perceptual qualities of such. The proximity to the AONB extension area would result in the AONB extension area not only experiencing significantly increased aircraft movements within its immediate setting, but those aircraft would be substantially closer – and coming in to land / taking off above / adjacent to the AONB, not 3km distant and higher in the sky. In addition, the proximity of the AONB extension area is likely to reduce its capacity to absorb further increases in aircraft movements without compromising the Special Qualities of the AONB – which include aesthetic and perceptual qualities. The Hertfordshire Host Authorities therefore strongly disagree with the assessment of a 'low' magnitude of impact on the aesthetic and perceptual qualities of the AONB extension area.</p> <p>The capacity to absorb increased aircraft movements, lighting, visual intrusion, vehicular activity within the AONB boundary to access London Luton Airport or similar factors may also affect the Sensitivity rating of the AONB extension area in relation to capacity. Susceptibility to change is not considered in relation to the AONB extension area as a landscape receptor. The Hertfordshire Host Authorities strongly disagree with this omission. The guidance of the Chilterns Conservation Board in their Position Statement on 'Development Affecting the Setting of the Chilterns AONB' has also been omitted. The Proposed Development would become contained within the immediate setting of the AONB extension area. Effects on the AONB setting are potentially considerable and should be included within the sensitivity test</p>	
6	Landscape and visual	<p>The Hertfordshire Host Authorities disagree with the findings in Table 8.3 of Appendix 5.2 Light Obtrusion Assessment Part A [APP-052] that there would be no significant effects through light obtrusion, as they are not confident that the methodology used is sufficient to support those findings.</p> <p>Assessment of artificial lighting on landscape and visual receptors should be undertaken in line with Guidelines for Landscape and Visual Impact Assessment (GLVIA3) guidance. The Applicant acknowledges that using appropriate GLVIA3 methodology could result in a different outcome – just 'not necessarily'. Basing conclusions on something that might 'not necessarily' happen is not appropriate.</p> <p>The LVIA should not use the methodology developed for other technical specialists. The Applicant should apply appropriate methodology to a nighttime assessment.</p> <p>The Applicant's Response states that 'Effects from transient lighting have not been included in the assessment' as they cannot be modelled. Effects from</p>	<p>The Applicant has responded to this matter in the Applicant's Post Hearing Submission - Issue Specific Hearing 8 (ISH8) [REP6-066].</p>

I.D	Topic	Deadline 6 submission (Verbatim)	Luton Rising's Response
		<p>transient lighting is not expected to be supported by quantitative modelling. This again highlights the nonindustry standard methodology being used (i.e. not GLVIA3). Perceptual qualities cannot be modelled but form a crucial part in understanding Magnitude and Effect. It is worrying that the Applicant suggests that such perceptual qualities should be ignored. Can the Applicant confirm to the ExA that such factors are considered and given due weight in the LVIA? The Hertfordshire Host Authorities again request that an appropriate qualitative assessment of transient lighting is included.</p> <p>The Applicant's response states that 'night time views from residential properties will differ from day time views due to internal screening (for example curtains or blinds being drawn)'. The use of curtains would more likely influence magnitude of impact / change, not sensitivity. There may be keen astronomers, particularly in relation to the AONB's Dark Skies who wish not to draw any curtains / blinds. Curtains would not block out the lighting from transient lighting unless they were blackout curtains. A 'worst-case' scenario in line with GLVIA3 guidance should therefore be adopted, particularly where potential screening effects are unknown. This would be in line with the LVIA (which for example considers winter views).</p> <p>Appendix 5.2 Light Obtrusion Assessment Part A of the ES [APP-052] identifies the Main Application Site as being within an E3 zone, with obtrusive light at identified viewpoints not exceeding the E3 guidance limits on light obtrusion. However, where a viewpoint is not located within an E3 zone (and it can reasonably be assumed that receptors in the AONB for example would be located within an E0 or E1 zone), then can the Applicant confirm to the ExA that there would be no increase in light obtrusion in those locations within the acceptable limits of an E0 or E1 zone?</p>	