



Additional Response to ExA Commentary on draft DCO

Application by Luton Rising to extend London
Luton Airport

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1 Introduction

- 1.1 This report provides an additional response to the report submitted by the five Host Authorities entitled ‘Host Authorities’ Response at Deadline 8 to DCO Matters’.
- 1.2 The Examining Authority submitted its commentary on the dDCO on 16 January 2024 (PD-018), and the joint Host Authorities have submitted a comprehensive response. However, that response did note with regard to ‘Schedule 1 (Authorised Development) – Work No. 6e’ that
- “Luton Borough Council and Central Bedfordshire Council in particular, have concerns with the proposed deletion and are responding separately to the other Host Authorities in relation to the proposed deletion of these works.”*
- 1.3 This report provide LBCs further comments with regard to that matter.

2 PD-018 ExA’s commentary on, or schedule of changes to the draft DCO

Reference	Reason	Comment
Offsite Highway Works Work No. 6e	Due to the significant number of relevant representations expressing concerns regarding the extent of the proposed works to Eaton Green Road, Wigmore Lane and Crawley Green Road and the lack of sufficient justification for these works the ExA considers they are unnecessary and therefore should be deleted from the draft DCO.	<p>LBC disagrees with the ExA’s suggestion that the proposed offsite highway works at Eaton Green Road, Wigmore Lane, Crawley Green Road and Lalleford Road junctions should be removed from the draft S106 agreement.</p> <p>LBC’s initial response to the need for these junction improvements was provided at deadline 6, (Luton Borough Council Deadline 6 Submission - Post-hearing submission - Responses to ISH8 Action Points [REP6-107]) and is repeated below.</p> <p>The requirement for mitigation at these junctions is further supported by the Applicant’s recent COVID-19 modelling. The modelling demonstrates an increase in traffic in the Crawley Green Road area and the Park Street Osborne Road area in 2027, this traffic being generated/displaced as a result of the removal of the Vauxhall Way widening from the 2027 scenario. It is</p>

		<p>expected that the removal of the Eaton Green Road, Wigmore Lane, Crawley Green Road and Lalleford Road mitigation schemes would have a similar effect resulting in a wider displacement of traffic creating congestion around the town and potentially in to the rural roads of North Hertfordshire.</p> <p>The justification for the deletion of these schemes seems in part, as a result of the number of representations received as to the extent of the mitigation works in the area. While these concerns should be considered by the Applicant and the local highway authority in executing the works they should not be considered in determining whether or not the works are required in mitigation of the development. It is suspected that the representations may also be raised as part of a general objection to the airport expansion rather than specifically relating to the mitigation measures.</p> <p>REP6-107 response:</p> <p><i>Initial mitigation proposals were shared with LBC in 2019. These proposals were developed in response to VISSIM modelling that was undertaken. Model outputs that justify the highway works were shared in a series of meetings that ran through 2019-2022 as part of engagement with Luton Council.</i></p> <p><i>These discussions included reviewing development assumptions, modelling scenarios, coding of the highway network/layout, driving behaviour, modelling convergence, analysis of the two scenarios, network performance, journey times, and level of service and flow paths.</i></p> <p><i>In response, LBC has provided feedback, iteratively, on the design of highway schemes proposed as part of the DCO. With respect to Crawley Green Road / Wigmore Lane and Eaton Green Road, the council is satisfied that the mitigation is</i></p>
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		<p><i>proportionate to reflect latent/induced demand for these links and junctions generated by airport development. It is worth noting that highway mitigation proposed along these roads also takes account of traffic displacement and congestion that would otherwise occur on other parts of the local road network if the capacity enhancements on these sections of the highway are not delivered.</i></p> <p><i>It should be noted, that the final form of solution may differ from the outline designs included in Schedule 1 of the DCO. The OTRIMMA makes it clear that where requested by the highway authority (and approved by the respective planning authority) the applicant may agree to an alternative form of mitigation in the same location. This approach appropriately accounts for any divergences between predicated and actual network flow that occur over the life of the expansion and allows the highway authority to 'adjust down' the scale of works if necessary.</i></p>
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