



**CENTRAL BEDFORDSHIRE COUNCIL COMMENTS ON DEADLINE 8
SUBMISSIONS**

LONDON LUTON AIRPORT EXPANSION DEVELOPMENT CONSENT ORDER

Version – FINAL

Introduction

This document sets out the response of Central Bedfordshire Council (CBC) to various documents submitted at Deadline 8. The comments include input from technical consultants.

CBC consider that some submissions require a response where it is necessary to provide clarification. Where a document has not been responded to, this does not mean that the points are agreed.

Two separate reports have been submitted on behalf of the five Host Authorities, namely:

- CSACL's Brief Review of the *'Applicant's Response to Written Questions NE.2.1 and NE.2.2 – Demand Forecasts' [REP8-037]*; and
- Pinsent Masons document, *'Host Authorities' Response at Deadline 9 to DCO Matters'*.

1. REP8-003 Draft Development Consent Order

Please see the joint Host Authority response compiled by Pinsent Masons, “*Host Authorities’ Response at Deadline 9 to DCO Matters’*”.

In terms of highway related matters, CBC continue to have concerns regarding the processes for the discharge of highway requirements and some aspects of the Protective Provisions and these are covered in more detail in the joint Host Authority response.

2. REP8-915 ES Appendix 10.6 Cultural Heritage Management Plan

CBC are satisfied with the amended CHMP and have no further comments to make.

3. REP8-022 Design Principles

CBC have no comments to make on the amended D8 document but have been in discussions with the applicant on additional points to be included in the Deadline 9 update.

4. REP8-024 Framework Travel Plan

CBC have the following comments on the Framework Travel Plan:

- 1.3.5 suggest that there is a Travel Plan Champion at each business within the Airport and that the Champions liaise regularly with the overall Travel Plan Coordinator. Recommend that the businesses use Mode shift STARS to monitor their progress.
- Table 5.3. Additional cycle spaces should be installed before the building is occupied.
- Table 5.3 Provide clear signage for cyclists and pedestrians accessing the site.
- Recommend that welcome packs are provided for new employees and sustainable travel information is included on the staff intranet and the main airport website for visitors.
- Sustainable travel information for both staff and visitors should be displayed on noticeboards.
- Numbers of employees and their postcodes to be added to the Travel Plan once known.
- The Travel Plan funding commitments should be listed.
- Surveys of vehicle numbers entering and exiting the site during peak times should be taken.
- It should be noted that electric scooters should only be used if part of a hire scheme.

5. REP8- 029 Applicant’s Response to ISH4 AP7 – Updates on Road Safety Audits

The updated submission related to the Road Safety Audits undertaken at two locations within the Central Bedfordshire Highway network seeks to address the outstanding matters related to:

- The A1081 / London Road (South) Roundabout
- The A1081 / Gipsy Lane works

With regards to the A1081 / London Road (South) Roundabout it is noted that the applicant has now proposed to include high mast signals for the offside signal head as part of the detailed design stage. CBC would be content with this additional proposal.

Whilst not raised within the Safety Audit, CBC have previously commented that an engineer's service bay will be required to facilitate maintenance and servicing of the signal equipment and that this had not been identified on the submitted plans. CBC were of the view that the bay should be shown on plan to demonstrate that a suitable location could be identified, but this has not been provided. CBC do however welcome the revised description of the works within the DCO which include reference to a maintenance bay and the removal of the 'no kerblines alterations' wording, which could have precluded such a bay being provided for.

As such CBC are content that the Safety Audit Problems related to the A1081 / London Road (South) junction can be addressed at the detailed design stage.

With regards to the A1081 / Gipsy Lane works CBC have maintained consistent concerns that the scheme proposed may not be fully deliverable (when taking into account the problems identified within the Safety Audit) within the DCO order limits. In addition, CBC have previously identified in the Deadline 7 submission – 'Comments on any further information / submissions received by Deadline 6', that a proportion of the land required to deliver the highways works, (specifically the forming of part of the second lane of the B653 approach to the A0181 and associated slope regrading and securing of forward visibility) is not public highway, although it appears to be treated as public highway and referred to as such within the submitted Book of Reference. At the time of writing this matter is not understood to have been resolved.

With regards to Safety Audit Problems 3.1 and 3.7, it is noted that the updated Safety Audit Designers Response includes cross section plans of the proposed revised scheme taken at two points on the A1081 provided as Figure 3.5 to demonstrate what can be achieved within the order limits. These appear to show a minimum permissible offset between the edge of carriageway and the existing VRS of 0.45m, minimum recommended lane widths of 3.0m, and cycle lanes reduced in width to 1.2m.

With regards to Safety Audit 3.1, the revised cross section shows a reduced level of clearance between the RRS and the gantry footing, at 0.6m. The Safety Audit recommendation is that 'It should be ensured that the items of street furniture can be adequately protected by vehicle restraint systems, without encroaching into the working width of the VRS.' Whilst the designer's response accepts the recommendation, and states that this would be addressed at detailed design stage, CBC concern is as previously stated, i.e.: that there may not be sufficient available width within the DCO limits to achieve this, with no information provided as to the working widths which would need to be provided for, and with the submitted cross

sections already working on the basis of minimum lane widths, clearances, and reduced cycle lane widths (on which further comment is made later).

It is also noted that the designs at present are at a feasibility level of detail and appear to be on an OS base rather than a topographical surveyed base. As such there is likely to be a further degree of potential variation in terms of actual available widths, with OS base mapping not being fully accurate or representative of on the ground conditions. As such the designer's response is not agreed, as CBC do not have full confidence that a design standards compliant scheme can be achieved within the order limits.

With regards to Safety Audit Problem 3.7, having taken on-site measurements of the existing layout, it appears that the existing cycle lane on the A1081 northern side (which was the only element safely accessible to obtain measurements) has a width of between 1.4 and 1.5m. As such the revised proposals would result in the further narrowing of what are already narrow cycle lanes, with a proposed width of 1.2m. CBC would also note that the recommended absolute minimum width of a cycle lane in LTN 1:20 table 5.2 is 1.5m).

When considered in combination with the proposed 3.0m running lanes immediately adjacent to the cycle lanes, this would bring vehicular traffic closer to cyclists on a substandard width cycle lane, and with less scope for drivers to give room to those cyclists, due to the narrowness of the running lanes. As such the designer's response is not agreed.

With regards to Safety Audit Problem 3.4, as per the previous CBC comments, the order limits include land which is not public highway, and it does not appear that changes to the nature of this land are proposed through the DCO (with all of the land detailed, apparently incorrectly, in the Book of Reference under Plot 112 as being public highway subject to temporary possession), as such the measures proposed to achieve appropriate levels of forward visibility do not appear to be achievable, with the land required for the clearance of vegetation, the regrading of the slope, and the replacement of signage, all being on land which is not public highway and which is not being secured through the DCO. CBC do however note that the Book of Reference is due to be updated at Deadline 9, and as such the position on this land could change. However, in the absence of any update, the Designers response is not agreed, and in addition, it is considered that the status of this land would call into question whether the works proposed (works 6e (b)) can be delivered as currently shown, notwithstanding the Safety Audit comments.

With regards to Safety Audit Problem 3.5, it is noted that white lining to guide a vehicle into the third lane is proposed to reduce the potential for side-swipes with left turning HGVs. Prior to agreeing to this designer's response, CBC would be seeking confirmation that the proposed approach to lining, which is not that generally applied at signal junctions, would meet the guidelines of the Traffic Signs Manual and other appropriate guidance. It is also noted that the option to retain a single, rather than two lane exit is proposed as a further potential response to the Safety Audit problem, which would also assist in overcoming the currently assumed use of non-highway land. However, whilst the updated note states that there would be no material difference in the operation of the junction, no supporting modelling work to qualify this has been provided to date.

6. REP8-037 Applicant’s Response to Written Questions NE.2.1 and NE.2.2 Demand Forecasts

The Applicant dismisses the use of a capacity for Gatwick of 67mppa on the basis that it is not the figure used by the DfT. This is not correct. The DfT figure used by York dates from a 2017 document, with the DfT’s position now (and since at least 2022) being that growth in passengers per ATM means that there is no fixed capacity at Gatwick (or Heathrow). The figure of 67 mppa identified by the Host Authorities is that determined by Gatwick’s own management team. A more detailed response is provided in the separate CSACL Review of the “*Applicant’s Response to Written Questions NE.2.1 and NE.2.2 - Demand Forecasts*” [REP8-037].

7. REP8-038 Applicant’s Response to Deadline 7 Submissions

Topic and Reference	Matters Raised	CBC Comments
Noise ID 10 and 15	Annual Aircraft Movement Cap	As set out in CBCs Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-051], CBC agree with the ExA that the annual aircraft movements cap is required and should not be more than 209,410 movements.
Noise ID11	Morning Shoulder period movement cap	As set out in CBCs Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-051], CBC consider that the morning shoulder period aircraft movements cap is required and should not be more than 8,829 movements and should be restricted to the absolute minimum (night-time shoulder also) required.
Noise ID 18 and 20	Noise Policy	CBC do not agree with the Applicant’s interpretation of aviation noise policy.

8. REP8-044 Outline TRIMMA

It is unclear why para 4.2.2 (d) removes the option for the applicant to provide data gathered at MT1 to the ATF to help evidence base the need for funding interventions. As per previous CBC responses, it is unclear how Local Authorities can evidence base the need for intervention without supporting data, with MT1 data having previously been a reasonable data source to refer to. CBC are of the view that this commitment should be reinstated.

Under the terms of reference for the ATF steering group, appended to the revised and updated OTRIMMA, CBC would suggest the inclusion of reference to a suitable arbitration process (for example reference to being subject to article 52 of the DCO).

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