



Hertfordshire Host Authorities

HERTFORDSHIRE HOST AUTHORITIES' COMMENTS ON ANY FURTHER INFORMATION / SUBMISSIONS RECEIVED BY DEADLINE 8

London Luton Airport Expansion



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HERTFORDSHIRE HOST AUTHORITIES' COMMENTS ON ANY FURTHER INFORMATION / SUBMISSIONS RECEIVED BY DEADLINE 88

London Luton Airport Expansion

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1 INTRODUCTION

1.1 PURPOSE OF THIS DOCUMENT

- 1.1.1. This document represents a table of responses by the Hertfordshire Host Authorities to certain further information and submissions made by the Applicant at Deadline 8, to be submitted at Deadline 9. It has been prepared jointly by Dacorum Borough Council (“DBC”), North Herts Council (“NHC”) and Hertfordshire County Council (“HCC”), in collaboration with their technical consultants, together as the “the Hertfordshire Host Authorities” to set out further comments considered necessary in detailing the impacts upon the local area of the Applicant’s proposed London Luton Airport Expansion Project (“the Proposed Development”).
- 1.1.2. This document should be read alongside the following documents which will also be submitted as part of Deadline 9:
- The Hertfordshire Host Authorities response to the Rule 17 Letter; and
 - The Host Authorities’ Response at Deadline 9 to DCO Matters.



2 REP8-017 - ENVIRONMENTAL STATEMENT – APPENDIX 14.7 ACCURATE VISUAL REPRESENTATIONS VIEWPOINTS 10B, 13, 14, 17, 17A

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
REP8-017	Landscape and Visual	Accurate Visual Representations (AVRs) for viewpoints 10B, 13, 14, 17, 17A	<p>The changes between [REP3-010] for Deadline 3, and this [REP8-017] for Deadline 8 are not readily apparent.</p> <p>As such, comments on the AVRs remain the same as those made previously in relation to [REP3-010] including:</p> <ul style="list-style-type: none"> • Lack of strict compliance with GLVIA methodology for visualisations. • The images show trees in winter (not in leaf) but mitigation hedgerows are shown with summer foliage (in full leaf) on the same image. <p>Refer to comments made previously such as Hertfordshire Host Authorities Responses to the Examining Authorities' (ExAs) First Written Questions [REP4-126]; Hertfordshire Host Authorities Responses to Deadline 3 Submissions [REP4-163]; Hertfordshire Host Authorities' Comments On Any Further Information / Submissions Received By Deadline 5: Written Questions [REP6-101].</p>
REP8-017 Viewpoint 10B	Landscape and Visual	Accurate Visual Representations for viewpoint 10B	<p>Vegetation that is being removed is still shown in the 'mitigated' photomontages. For example, Viewpoint 10B [REP8-017], all the trees / hedgerows identified for removal in the Existing View / Block Form of Max. Parameters are still shown in all the 'mitigated' images e.g. 'View with proposed planting (Phase 2a)'. This artificially increases the amount of screening shown in the image and is therefore inaccurate.</p>
REP8-017	Landscape and Visual	Accurate Visual Representations for viewpoints 10B, 13, 14, 17, 17A	<p>This viewpoint image illustrates the adverse impact a hedgerow can have in the severing of a currently open, expansive rural view. The appropriateness of blocking such views by hedgerow planting is <i>still</i> questioned - alternative forms of mitigation should be considered, such as the design of the built form, use of facade planting, planting vegetation that is more distant from the viewpoint etc.</p> <p>Refer to comments made previously on the appropriateness of mitigation in Deadline 7 submission - Responses to the Examining Authorities Further Written Questions relating to [PED2.18] at Deadline 7 [REP7-087] and Deadline 8 submission - Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 relating to [PED2.18] and [PED2.19] [REP8-055].</p>



3 REP8-023 - DESIGN PRINCIPLES (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
REP8-023 Section 3: Landscape	Landscape and Visual	Comments provided at Deadline 7.	<p>No changes have been made to Section 3 except for some document reference updates. Comments provided to the Applicant at Deadline 7 within Appendix 1 of the Hertfordshire Host Authorities' Comments On Any Further Information / Submissions Received By Deadline 6 [REP7-085] have not been incorporated.</p> <p>The updated version therefore adds nothing to the discussion relating to landscape design principles.</p>



4 REP8-029 - APPLICANT'S RESPONSE TO ISSUE SPECIFIC HEARING 4 ACTION 7 - UPDATES ON ROAD SAFETY AUDITS (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
Appendix C	Surface Access	Road Safety Audit (RSA).	Hertfordshire County Council will provide formal comments in respect of the RSA submitted at Deadline 8 [REP8-029] once they have had sufficient opportunity to review with their engineers. No RSA's have been provided for the alternative layouts, that the Applicant has recently shared with Hertfordshire County Council, for two of the three Hitchin junctions incorporating traffic signals. These alternative layouts are more in keeping with expectations of the Highway Authority and will need to follow the required technical process including RSA.



5 REP8-031 - RAIL IMPACTS SUMMARY (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
Section 7.5 & 7.6	Surface Access	<p>This updated document responds to specific queries and additional information being sought from Network Rail. Additional data in relation to St Albans and Harpenden patronage forecasts and crowding is provided in the following sections.</p> <p>Section 7.5 – Train capacity analysis including effects on St Albans and Harpenden stations.</p> <p>The document confirms that the assessment is based on CAA passenger survey and historical Thameslink loading data. The level of demand on individual services or O-D data is not available. Publicly available data on crowding shows departures from St Albans between 07.27 to 08.57 (6 services) passengers are not able to get a seat or significant standing capacity is not available at both Harpenden and St Albans on services also stopping at Luton Parkway.</p> <p>Section 7.6 – Impact of the removal of the aspiration for running 24 trains an hour.</p> <p>The document confirms that the assumption is that if demand grows the Thameslink corridor operator would consider again providing the 24tph (Thameslink 20/20) / seek to increase capacity to reflect demand growth and future revenue potential opportunity.</p>	<p>The Hertfordshire Host Authorities understand that Network Rail will review the findings from the additional information supplied by the Applicant in the Rail Impact Summary document [REP8-031]. Whilst awaiting Network Rail's response, there are still concerns from the Hertfordshire Host Authorities in relation to the capacity of the rail network including the impacts of the expansion on existing passengers at St Albans and Harpenden stations, and the potential to add to the current over-crowding that is experienced in the peak hours.</p>



6 REP8-033 - BUS AND COACH STUDY (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
Tale 3.2 and Figure 3.2	Surface Access	Additional text added in Section 5 Next Steps regarding future bus and coach market studies (every 5 years aligned to the Travel Plan).	<p>The updated Bus and Coach Study [REP8-033] still omits the Peterborough–Cambridge–Hitchin–Luton–Heathrow NX788 service from the existing network assessment (NX788 service) [REP6-097].</p> <p>[REP8-033] still proposes (in Figure 3.2) extending the NX737 service to Cambridge, rather than (or in addition to) increasing the frequency of the NX788 service, which has just six services a day as raised in the Issue Specific Hearing (ISH) 7 Post-hearing Submission [REP6-097].</p> <p>There is still no proposal to have any buses or coaches to / from London Luton Airport call at Hitchin station to provide a quicker and more convenient rail-and-bus route to London Luton Airport from the north-east, as requested in the ISH 7 Post-hearing Submission [REP7-097].</p> <p>It is understood that ultimately, the bus & coach strategy will be for the Airport Transport Forum (ATF) to develop and fund from the Sustainable Transport Fund (STF).</p> <p>The Hertfordshire Host Authorities request that the above points be incorporated into the study, to give the ATF a more complete starting point.</p>



7 REP8-037 - APPLICANT'S RESPONSE TO WRITTEN QUESTIONS NE.2.1 AND NE.2.2 - DEMAND FORECASTS

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
2.6, pdf Page 14 I.D.1	Need	Gatwick Airport passenger handling capacity. The Applicant has used a fixed figure of 50 mppa, while the Authorities advocate a gently rising capacity over time, with in the CSACL report of September 2023 [REP2-057] and illustrative figure in 2050 of 60.4 mppa being presented. Gatwick Airport has more recently published a figure of 67 mppa in 2048.	The Applicant dismisses the use of a capacity for Gatwick of 67mppa on the basis that it is not the figure used by the Department for Transport (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 document "London Luton Airport DCO: Review of the "Applicant's Response to Written Questions NE.2.1 and NE.2.2 - Demand Forecasts" [REP8-037]".



8 REP8-038 - APPLICANT'S RESPONSE TO DEADLINE 7 SUBMISSIONS

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
2.14 ID.10 & 15	Noise	Annual aircraft movement cap	As set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055], the Hertfordshire Host Authorities agree with the ExA that the annual aircraft movements cap is required and should not be more than 209,410 movements.
2.14 ID.11	Noise	Morning shoulder period movement cap	As set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055], the Hertfordshire Host Authorities 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.
2.14 ID.18 & 20	Noise	Noise policy	The Hertfordshire Host Authorities do not agree with the Applicant's interpretation of aviation noise policy, as we have set out in, for example, ISH 3 Post-hearing Submission [REP3-094].
2.17 ID.18 & 20	Surface Access	Mitigations at the three Hitchin junctions	The Hertfordshire Host Authorities had previously stated in ID.18 [REP8-038] that the revised layouts for two of the junctions were 'unacceptable'. However, having considered these layouts further they acknowledge that the revised layouts are more in line with their aspirations and welcome the opportunity to continue discussions with the Applicant to reach an agreeable solution both in terms of deliverability and cost. The Applicant currently proposes a 'side agreement'. The revised layouts are now more policy compliant and therefore we agree to them forming the basis of a side agreement, however Hertfordshire County Council are seeking to reduce their cost risk associated with accepting these mitigations without necessary assurance in relation to cost and deliverability (including RSA and modelling). It is therefore expected that this will not be achieved within the timeframe of the DCO examination, while a side agreement is still being considered.
2.13 ID.6	Landscape and Visual	Hedgerow Restoration	As set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055], the Hertfordshire Host Authorities consider that Hedgerow Restoration is not appropriate in some locations where it would block long-distance views and that alternative mitigation should be considered.
2.13 ID.7 & 9	Landscape and Visual	Glint and Glare Assessment	As set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055], the Hertfordshire Host Authorities consider that Glint and Glare should be considered within the perceptual / aesthetic qualities and visual amenity assessment.



Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
2.13 ID.8	Landscape and Visual	Combining Value and Susceptibility	The Hertfordshire Host Authorities do not consider that Sections 5.5 and 6.4 of Appendix 14.1 of the ES [AS-036] adequately explain how value and susceptibility are combined to determine sensitivity.
2.13 ID.10	Landscape and Visual	Appropriateness of Mitigation	As set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055], the Hertfordshire Host Authorities do not consider that mitigation has been thoroughly thought through in relation to impacts of large-scale built form.
2.13 ID.11	Landscape and Visual	Transient Lighting	As set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055], the Hertfordshire Host Authorities consider that effects of transient lighting should be included in the assessment and that the assessment should be based on a methodology that is compliant with Guidelines for Landscape and Visual Impact Assessment (GVLIA) 3.
2.13 ID.15, 16 & 18	Landscape and Visual	Area of Outstanding Natural Beauty (AONB) Baseline Tranquillity and Capacity	As set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055], the Hertfordshire Host Authorities consider that appropriate narrative on baseline tranquillity should be incorporated to justify the subsequent conclusions made. Understanding the capacity of the baseline resource to absorb more overflying aircraft (both day and night) is also crucial to informing the assessment. Without these considerations, the assessment of Tranquillity within the Special Qualities Assessment is not considered to be robust as it fails to adequately identify all pertinent contributing factors in the baseline environment (such as existing / proposed transient lighting, capacity of the baseline resource to absorb more aircraft, consideration of perceptual qualities in line with GLVIA).
2.13 ID.19	Landscape and Visual	AONB Assessment	<p>The Hertfordshire Host Authorities agree with the Landscape and Visual Impact Assessment (LVIA) conclusions that identify significant impact on the AONB, and as such the Proposed Development is not considered to be consistent with the Levelling-up and Regeneration Act 2023 (LURA) amendment to Section 85 of the Countryside and Rights of Way Act 2000, in relation to impacts on the Chilterns AONB as it fails to '<i>...further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty</i>' and instead will result in harm.</p> <p>The Hertfordshire Host Authorities do not consider that impacts on the AONB have been adequately considered within the Special Qualities Assessment and therefore they do not agree with its conclusions. Refer to comments made in respond to 2.13 ID.15, 16 & 18 above and as set out in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055].</p>



9 REP8-039 - APPLICANT'S RESPONSE TO COMMENTS FROM THE HIGHWAY AUTHORITIES ON THE 'ACCOUNTING FOR COVID-19 IN TRANSPORT MODELLING FINAL REPORT [AS-159]

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
Covid 19 Transport Modelling	Transport Modelling	All the Applicants responses in [REP8-039] received at deadline 8 relating to the queries raised by the Hertfordshire Host Authorities [REP7-087-Appendix 2].	<p>Following the review of [REP8-039], the Hertfordshire Host Authorities still have concerns (as detailed in Appendix 2 of [REP7-087]) in relation to the transport modelling undertaken. The responses provided by the Applicant in [REP8-039] have not changed this position. The Hertfordshire Host Authorities position is detailed in the PADSS [REP8-056].</p> <p>The Hertfordshire Host Authorities are not asking for any additional modelling to be undertaken at this stage due to the time constraints. However, the Hertfordshire Host Authorities are seeking to manage the modelling uncertainty and the risks associated with the impacts on their network. The management of this risk is best achieved through the TRIMMA, which is secured by the DCO, by agreeing to provide additional monitoring sites and ensuring that there are sufficient funds available to support identified mitigation improvements.</p> <p>The Applicant has proposed a 'side agreement' (not received at time of writing) to cover additional monitoring in the North Herts 'rural areas'. Hertfordshire County Council are also seeking additional monitoring sites near Harpenden: A1081 south of Junction 10a; Annables Lane / Watery Lane on the approach to M1 junction 9, within Kimpton and Whitwell villages and further south from the proposed monitoring site on the A1081 to better pick up flows towards Harpenden; monitored directly by the Applicant as part of the TRIMMA. This is to ensure there is adequate geographical and temporal coverage for the TRIMMA Type 2 monitoring to identify and mitigate any adverse impacts that may arise. These sites have not yet been agreed by the Applicant.</p> <p>To further mitigate the modelling uncertainty and risk, the Hertfordshire Host Authorities also require access to a significantly larger Residual Impact Fund (RIF) to cover the cost of any unplanned mitigations sought under the TRIMMA.</p>



10 REP8-040 - APPLICANT'S RESPONSE TO EXAMINING AUTHORITY'S RULE 17 REQUEST DATED 17 JANUARY 2024

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
4	Cultural Heritage	Assessment of Noise on Cultural Heritage Assets. Raised by the ExA.	The Applicant's response is noted. The Applicant's response states: 'The understanding of the change in noise experienced by the asset is informed by Chapter 16 of the ES [AS-080].' It further states: 'The specific assessment of increased frequency of flights is useful when understanding significant increases in noise level and where this would have a significant effect on a heritage asset. No significant increases in noise levels at heritage assets were identified; therefore, specific assessment was not undertaken.' See comments on Reference 5 below.
5	Cultural Heritage	Assessment for St Paul's Walden Bury and Bendish Conservation Area.	The Applicant refers to Chapter 16 of the ES [AS-080]. The response further notes that 'The specific assessment of increased frequency of flights is useful when understanding significant increases in noise level and where this would have a significant effect on a heritage asset. No significant increases in noise levels at either St Paul's Walden Bury RPG or Bendish Conservation Area were identified; therefore, specific assessment was not undertaken.' With reference to St Paul's Walden Bury, the Applicant further stated that 'No specific analysis of aural intrusion from the frequency of flights has been undertaken. There will be an increase in overflights which may be visible from the asset which has been considered in the assessment of operational effects and is not considered to affect the significance of the asset. No harm has been concluded on this basis.' This issue has been included within the PADSS [REP8-056]. The Hertfordshire Host Authorities position remains unchanged as set out in the PADSS [REP8-056].
6 and 7	Design	<i>The Applicant considers that the Coach Station (Work No. 3d) and the Luton DART Terminal 2 Station (Work No. 3g) should be subject to an Independent Design Review in addition to the three items currently listed within Design Principles [REP7-034].</i> <i>The Applicant has submitted an update to the Design Principles at Deadline 8 [TR020001/APP/7.09] to include the Coach Station (Work No. 3d) and the Luton DART Terminal 2 Station (Work No. 3g) within the proposed Independent Design Review process.</i>	The inclusion of the Coach Station (Work No. 3d) and the Luton DART Terminal 2 Station (Work No. 3g) into the Design Review process is welcomed by the Hertfordshire Host Authorities. The Hertfordshire Host Authorities remain of the view that the proposed Terminal 1 extensions (Work No. 3a), and car park P12 (Work No. 4r), would also benefit from independent design review. However, the Hertfordshire Host Authorities are content for the scope of independent design review to be progressed by Luton Borough Council as the relevant planning authority.
13	Heritage	Applicant - Accounting for Covid-19 in Transport Modelling - Environmental Appraisal Regarding ExA's request: "[REP7-079] includes air quality criteria for excluding road links from further consideration. The ExA requests that the Applicant provides further justification for using criteria (d) in paragraph 1.3.3, ..."	The Hertfordshire Host Authorities note the Applicant's response to ExA on this matter and reiterate Hertfordshire Host Authorities' related comment in the Hertfordshire Host Authorities' Comments on Any Further Information / Submissions Received by Deadline 7 [REP8-055] (to be addressed by the Applicant at Deadline 9) as follows: "Criterion d. is an atypical application of the IAQM / EPUK criteria which is not supported by the IAQM / EPUK guidance by Moorcroft and Barrowcliffe. et al. (2017) Land-use Planning & Development Control: Planning for Air Quality. v1.2, 2017. Institute of Air Quality Management, London. (Online:



Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
			<p><i>air-quality-planning-guidance.pdf (iaqm.co.uk), accessed on: 18 January 2024).</i></p> <p><i>This was discussed with the Applicant (as represented on Air Quality matters by Arup) on 18 January 2024. According to the Applicant, the ExA has also raised this issue and asked for clarification. It is understood that the Applicant will be issuing an amendment.”</i></p>



11 REP8-044 - OUTLINE TRANSPORT RELATED IMPACTS MONITORING AND MITIGATION APPROACH (TRIMMA) (TRACKED CHANGE VERSION)

Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment
Appendix 1.1.1 Table 4.1	Surface Access	<p>Monitoring Sites</p> <p>The updated Outline Transport Related Impacts Monitoring and Mitigation Approach (TRIMMA) provides the terms of reference and governance for the ATF Steering Group with respect to the RIF.</p>	<p>The Hertfordshire Host Authorities are still seeking additional monitoring sites within the TRIMMA to protect their network, given the uncertainty with the traffic modelling.</p> <p>The updated TRIMMA [REP8-044] provides the Terms of Reference (ToR) and governance for the ATF Steering Group with respect to the RIF in Appendix A. The terms of reference for the Active Travel Forum (ATF) (the wider body) have not been updated since deadline 4 [REP4-083].</p> <p>The ToR for the Steering Group is provided in Appendix A to the updated TRIMMA [REP8-044], and paragraph 4.1.3 of the ATF Terms of Reference [REP4-083] is unnecessarily restrictive:</p> <p><i>4.1.3 "Each organisation invited will nominate a single person to represent them. Each representative must be suitably qualified (e.g. a chartered in the relevant subject area) or have equivalent professional experience to allow the ATF to fulfil its technically-focused remit."</i></p> <p>The ATF suggested list of attendees in [REP4-083] are then listed including 4.1.1 (m) <i>"Bodies representing interests of walkers, cyclists and disabled people in the area."</i></p> <p>However, representatives of those bodies noted in 4.1.1 (m) may be volunteers without a relevant qualification or professional experience. The second sentence in 4.1.3 above [REP4-083] could be reviewed to be more general, e.g. <i>"Each representative shall contribute constructively to the ATF's technically-focused remit"</i> as paragraph 4.1.4 [REP4-083] by itself gives the chair sufficient discretion over who can sit on the ATF:</p> <p><i>4.1.4 "The final decision as to whether a nominated officer is suitably qualified rests with the chair of the ATF"</i>.</p> <p>This paragraph could usefully be elaborated to give the chair, or the ATF as a group, discretion to remove any member who engages in an unconstructive way.</p> <p>There is no detail provided on how the ATF will interact with the Steering Group making the decisions. Clarity is therefore needed on the role of those members of the ATF who are not represented on the Steering Group and how the two groups will interact. In order to address this, some principles for additional terms of reference should be secured in the TRIMMA.</p> <p>To future-proof the ToR, the constituent parties should be <i>described</i> rather than <i>named</i> in Appendix A - A1.1.1 of the TRIMMA [REP8-044], e.g., <i>"the national highways agency and the highway and transport authorities for all local authority regions within [for example] 20km of Luton Airport"</i>. This</p>



Reference	Topic	Matters Raised	Hertfordshire Host Authorities' Comment						
			<p>would allow for any future reorganisation of local government or renaming of government bodies.</p> <p>The Hertfordshire Host Authorities would like to see mode-shifting and car-sharing as explicit examples of acceptable mitigation in <i>Table 4-1: MT2 example measures</i> (p13 of the TRIMMA [REP8-044]) proposing the following or similar:</p> <table border="1" data-bbox="1846 537 2873 898"> <thead> <tr> <th data-bbox="1846 537 2125 590">Measure</th> <th data-bbox="2125 537 2873 590">Example Rationale</th> </tr> </thead> <tbody> <tr> <td data-bbox="1846 590 2125 747">Vehicular travel demand management</td> <td data-bbox="2125 590 2873 747">Any measure that mode-shifts car trips to active travel or public transport, releasing road capacity that can accommodate growth in vehicular traffic to / from the airport.</td> </tr> <tr> <td data-bbox="1846 747 2125 898">Car-sharing</td> <td data-bbox="2125 747 2873 898">Any scheme to increase vehicle occupancy by enabling, promoting, or incentivising people to ride-share when travelling to / from the airport, reducing vehicular traffic to / from the airport.</td> </tr> </tbody> </table> <p>If the STF should be available to fund mitigatory measures beyond the budget of the RIF, the Applicant needs to consider what may need to change in the STF Terms of Use (p11 of [REP7-042] (Sustainable Transport Fund) and Schedule 9 of the Draft s106 [REP7-074]. The wording of the Terms of Use for the STF is much looser than for the RIF, so the Hertfordshire Host Authorities request a small amendment to paragraph 2.1.2 in Schedule 9 [REP7-074] along the following lines:</p> <p><i>“2.1.2 Eligibility: ... The ATF Steering Group must be satisfied that the interventions proposed for funding are likely to provide a positive impact on ... priority areas, or to reduce a negative transport-related impact of the Development.”</i></p>	Measure	Example Rationale	Vehicular travel demand management	Any measure that mode-shifts car trips to active travel or public transport, releasing road capacity that can accommodate growth in vehicular traffic to / from the airport.	Car-sharing	Any scheme to increase vehicle occupancy by enabling, promoting, or incentivising people to ride-share when travelling to / from the airport, reducing vehicular traffic to / from the airport.
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