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London Luton Airport Expansion

Planning Inspectorate Scheme Ref: TR020001

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**8.178 Applicant's Response to Examining Authority's
Rule 17 Request dated 17 January 2024 - Deadline 9**

Infrastructure Planning (Examination Procedure) Rules 2010

Application Document Ref: TR020001/APP/8.178



The Planning Act 2008

The Infrastructure Planning (Examination Procedure) Rules 2010

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

**8.178 Applicant's Response to Examining Authority's Rule 17
Request dated 17 January 2024 - Deadline 9**

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1 INTRODUCTION

- 1.1.1 This document has been prepared by Luton Rising (a trading name of London Luton Airport Limited) ('the Applicant') for submission to the Examining Authority ('ExA'). It provides the Applicant's response to the Rule 17 request issued by the ExA on 17 January 2024 [PD-019] and provides the information requested from the Applicant for Deadline 9.
- 1.1.2 This document is provided in addition to a previous response document submitted by the Applicant [REP8-040] at Deadline 8 which stated that the response to the requests outlined in Table 1.1 below would be provided at Deadline 9.

Table 1.1: ExA's Requests for which a response is provided in this document

Ref.	ExA Request [PD-019]
2	<p>Luton Borough Council (LBC), Central Bedfordshire Council and the Applicant - Solar Farm on Land to the South of the Runway (LBC ref: 23/01314/GPDOPD and CBC ref: CB/23/03617/OAC)</p> <p>The ExA notes the responses from LBC [REP7-090] and Central Bedfordshire Council [REP7084] to its further written question BCG.2.4, advising that they issued a decision for the creation of a solar farm on land to the south of the runway, which confirmed that the proposal constitutes permitted development.</p> <p>Please provide a copy of the plans for this development and advise of any implications for the current application.</p> <p>As the solar farm development is now in the consented baseline, the Applicant is requested to submit further information setting out any implications on the Proposed Development and the findings of the Environmental Statement (ES). This should include any potential changes to the Landscape and Visual Impact Assessment, and Cultural Heritage, with reference to Luton Hoo and Someries Castle. This element of the response can be submitted at D9.</p>
11	<p>Applicant - Cycling and Walking</p> <p>The National Planning Policy Framework states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that 'c) opportunities to promote walking, cycling and public transport use are identified and pursued'. To date the Applicant has only supplied specific detail as to how it has considered non-motorised users for Wigmore Lane [REP7-073].</p> <p>Provide similar detail regarding cycling and walking provision for all the locations where off-site highway works are proposed, including detail of locations where the recommendations in Local Transport Note 1/20 could not be achieved and the reasons, by D9.</p>

2 RESPONSE 2: SOLAR FARM ON LAND TO THE SOUTH OF THE RUNWAY

2.1 Description of the Solar Farm

- 2.1.1 The description below is taken from the application letter submitted as part of the application (23/01314/GPDOPD). The layout of the Solar Farm as proposed by LLAOL is shown on the site layout plan included in Appendix A to this document.
- 2.1.2 Solar Photovoltaic (PV) panels will be installed across five development areas along the southern boundary of the airport site. The panels, covering an area up to approximately 96,780 m², will be secured onto steel frames and constructed as a series of arrays. At their highest point, the panels will be 3.0m tall, dependent on the angle of the panels.
- 2.1.3 The solar PV panels will connect to up to six new substations located across the solar farm site. Measuring approximately 2.0m in height, 3.5m in width and 4.0m in length, the substations will include switchgear, transformers and cable supports. They will be mounted on plinths and will be enclosed by 1.8m high metal palisade fencing.
- 2.1.4 Up to six Battery Energy Storage Systems (BESS) will be installed adjacent to each new substation. The batteries will enable electricity generated by the solar PV panels to be stored and released during periods of peak demand, maximising the use of electricity generated at the airport site. The BESS will be containerised and located atop of plinths. They will measure approximately 2.6m in height, 2.4m in width and 6.0m in length.
- 2.1.5 Low voltage (LV) cables will connect the solar PV panels to the new substations, BESS and a switching station. The switching station will be housed within an enclosed glass reinforced polymer building measuring approximately 3.0m in height, 4.3m in width and 8.8m in length.
- 2.1.6 The high voltage (HV) cable will be laid in trenches (up to approximately 1,100mm deep and 800mm wide), except for when crossings of the runway and taxiway are required where trenchless boring will be utilised. A new section of perimeter road will be constructed to accommodate the solar farm. The road will be circa 553m in length and 6m in width. The road will be surfaced with asphalt.
- 2.1.7 Construction works are expected to take place approximately from the second half of 2024 to the second quarter of 2025.

2.2 Implications for the Proposed Development

- 2.2.1 The Proposed Development for which development consent is being sought would not be altered by the proposed Solar Farm. London Luton Airport Operations Limited (LLAOL), the current airport operator and applicant for the Solar Farm is aware of the Proposed Development and would adjust the Solar Farm as appropriate where delivery of the Proposed Development requires.

2.2.2 PV panels shown as located in the same area as the proposed Fire Training Ground (FTG) would be moved to allow the FTG to be constructed, operated and accessed as proposed.

2.3 Implications for the findings of the Environmental Statement

2.3.1 The consideration of the future baseline in the Environmental Impact Assessment (EIA) is described in **Chapter 5 Approach to the Assessment of the Environmental Statement (ES) [AS-075]**. The proposed introduction of the Solar Farm described above into the future baseline considered in each technical assessment in the ES is proved in Table 2.1 below.

Table 2.1: Implications of Proposed Solar Farm on DCO ES

Aspect	Potential Change	Effect
Agricultural Land Quality and Farm Holdings	The Solar Farm is proposed on airport operational land and will not alter the assessment - no change.	No change
Air Quality	There is potential for construction activities to occur for both developments simultaneously in 2025 however the distance between them, the small scale of the Solar Farm, and the fact that it would substantially complete before construction of the Proposed Development (therefore considered in the future baseline) means there would be no change to construction effects. Adjustment of the Solar Farm to allow construction of the FTG would be a very small change during construction activities of the Proposed Development and there not alter the overall effects reported. The Solar Farm does not alter operational emissions to air or the assessment – no change.	No change
Biodiversity	The Solar Farm is proposed on airport operational land and will not alter the assessment - no change. It should be noted that habitats in the location of the Solar Farm were excluded from Biodiversity Net Gain calculations. It is assumed grassland under the solar panels will be regularly cut similar to current operations. No protected species distribution changes are anticipated as part of future baseline with the Solar Farm in place.	No change
Climate Change Resilience	The Solar Farm would not alter the resilience of the Proposed Development to climate change or any in-combination climate change effects reported in the ES – no change.	No change
Cultural Heritage	The Solar Farm would be substantially in place before construction of the Proposed Development; therefore it forms part of the Future Baseline and would not change construction effects reported in the ES.	No change

Aspect	Potential Change	Effect
	<p>Given the proximity of the solar farm to the existing infrastructure of the operational airport it will not form a distinct feature in the setting of the heritage assets. Regarding Someries Castle, there are limited views towards the north with a minor adverse effect concluded from changes to setting as a result of taller elements of the Proposed Development. There would be no change to the assessment.</p> <p>Regarding Luton Hoo Registered Park and Garden (RPG), a moderate adverse effect has been identified as a result of changes to its setting. This reflects the introduction of new elements into the existing view. This will not change because of the Solar Farm - no change</p>	
Employment and Economics	The Solar Farm would not alter the outcome of the economics and employment assessment and consequently the impact of the Proposed Development. – no change.	No change
Greenhouse Gases	It is reported that the Solar Farm would allow around 25% of the airports electricity consumption to be generated from renewable energy. This would reduce the baseline carbon emissions from electricity use in the existing airport. This would be expected to continue to reduce emissions as the Proposed Development is delivered but would not alter the overall conclusions of the greenhouse gas assessment and consequently the effect of the Proposed Development on the climate - no change.	No change
Health and Community	The Solar Farm would be substantially in place before construction of the Proposed Development and form part of the Future Baseline, and would not change the conclusions of the Health and Community assessment reported in the ES – no change.	No change
Landscape and Visual	<p>The Solar Farm would be substantially in place before construction of the Proposed Development and form part of the Future Baseline.</p> <p>The Solar Farm would be constructed within the operational area of the airport within the grassed area to the south of the runway. This would not result in any substantive change to either the physical landscape or landscape character. Accordingly, there would be no change to the significance of landscape effects.</p>	No change

Aspect	Potential Change	Effect
	The Solar Farm would be visible in some views from the south of the airport including from Luton Hoo, Someries Castle and from footpaths in this area. However, the Solar Farm would be seen in the context of existing airport buildings, structures and infrastructure. Accordingly, there would be no change to the significance of visual effects of the Proposed Development - no change.	
Major Accidents and Disasters	Solar PV panels will be located to the south of the runway and track south following the direction of the sun in the northern hemisphere. All appropriate safety standards would need to be complied with in detailed design and installation of the Solar Farm. The Solar Farm is unlikely to interact with or alter the potential environmental effect of hazards for the construction or operation of the Proposed Development – no change.	No change
Noise and Vibration	The Solar Farm would be constructed before construction of the Proposed Development commenced and would not alter the operational noise and vibration effects reported in the ES – no change.	No change
Soils and Geology	<p>Development areas 1 and 5 of the Solar Farm will be in areas where natural soils/Made Ground were placed under a previous planning permission (LBC ref: 17/02219/FUL). Some of the materials are considered 'waste' by the Environment Agency. A section of the HV cable will be laid through the former Eaton Green Landfill. It is assumed all materials/waste will be managed in accordance with current waste legislation and guidance and would therefore not alter the conclusions of the ES related to contaminated soils/materials and wastes.</p> <p>The Solar Farm would be substantially constructed before construction of the Proposed Development has commenced and would not alter the assessment of construction or operation effects for soils and geology reported in the ES – no change.</p>	No change
Traffic and Transportation	The Solar Farm would be substantially constructed before construction of the Proposed Development commenced and would not alter the construction or operational traffic and transportation effects reported in the ES – no change.	No change

Aspect	Potential Change	Effect
Waste and Resources	The Solar Farm would be substantially constructed before construction of the Proposed Development commenced and would not alter construction or operational waste generation or material resources consumed or associated effects reported in the ES – no change.	No change
Water and Flood Risk	The Solar Farm would not alter the potential environmental effects from the construction or operation of the Proposed Development or result in an increased potable water demand (above the 2019 baseline) – no change.	No change
In-combination and Cumulative	The Solar Farm would be substantially completed before construction of the Proposed Development and is therefore considered in the future baseline not in-combination or cumulatively – no change.	No change

3 RESPONSE 11: CYCLING AND WALKING

3.1 Introduction

3.1.1 The Applicant considers that the question regarding walking and cycling provision and Local Transport Note (LTN) 1/20 (Ref 1) at the locations of proposed off-site highway improvements was previously covered in TT.1.19 of the **Applicant's Response to Written Questions - Traffic and Transportation including Surface Access [REP4-069]**. Nevertheless, the below section adds further detail to the previous response.

3.2 Background

National Planning Policy Framework

- 3.2.1 The National Planning Policy Framework (NPPF) (Ref 2) sets out the Government's planning policies for England, and how they should be applied. Section 9, paragraph 108 of the NPPF - 'Promoting sustainable transport', states "*that transport issues should be considered from the earliest stages of plan-making and development proposals, so that c) opportunities to promote walking, cycling and public transport use are identified and pursued;*"
- 3.2.2 Paragraph 108 sets out the transport considerations that should be addressed in relation to a development proposal. To accord with this, Chapter 8 of the **Transport Assessment [AS-123]** sets out the proposed improvements to pedestrian and cycle facilities aimed at enhancing the routes to and around the airport.
- 3.2.3 The nature of the airport use means that the volume of walking and cycling trips are generally low. For passengers, cycling is not appropriate, and walking is essentially for trip end movements having travelled by another mode. Walking for staff is also likely to be related to trip ends due to the size of the airport estate but cycling would be practical for local trips.
- 3.2.4 As a result, the proposed off-site highway improvements are generally to accommodate increased volumes of traffic but they also include provision for pedestrian and cycle facilities where appropriate to provide connections to and around the airport. In the wider area, the off-site highway mitigation includes pedestrian and cycle facilities where there are existing footways and cycle routes/facilities.
- 3.2.5 It should be noted that the junctions in Hitchin are more than 12km from the airport, well beyond a reasonable cycle catchment and there would not therefore be any cycle demand related to the airport at these junctions. In addition, the M1 Junction 10 only serves motorway traffic and does not have any pedestrian and cycle facilities.

Local Transport Note 1/20

- 3.2.6 LTN 1/20 provides guidance to local authorities on designing cycle infrastructure and principally sets out guidance for the delivery of dedicated cycle infrastructure schemes. The document also provides guidance on the

delivery of new and improved cycle infrastructure as an integral part of general highway improvements and as part of new developments and when making alterations to links and junctions on existing highways. LTN 1/20 notes that routes should be planned holistically as part of a network - isolated stretches of provision, even if individually good, are of little value (paragraph 1.6.1, point 8 of LTN 1/20). LTN 1/20 provides a significant number of options in terms of cycle route designs, including on-road, shared off-road and segregated off-road, where the treatment of junction designs will vary depending on the proposed type and layout of the adjoining cycle route.

- 3.2.7 With the exception of the Wigmore Lane corridor and the A1081 New Airport Way junctions with Gipsy Lane and London Road, the proposed off-site highway improvements in Luton, Hitchin and Central Bedfordshire are not located on existing cycle routes. The provision of cycle facilities would effectively be isolated, which is of little value as stated in LTN 1/20. Standalone cycle facilities were not therefore included as part of the proposed off-site junction improvements, which is in line with the LTN 1/20 guidance.

Future Proposals

- 3.2.8 Luton Borough Council (LBC) published its Local Cycling and Walking Infrastructure Plan (LCWIP) (Ref 3) in 2023, around the time the application for development consent was submitted, and this was not therefore available for consideration during the preparation of the Transport Assessment and the associated design of off-site highway mitigation proposals. However, several of the proposed cycle routes included in the LCWIP coincide with the locations of the off-site highway mitigation measures. Drawing **LLADCO-3C-ARP-SFA-SWI-DR-CE-0004** 'Cycling Infrastructure Plan', submitted as part of the Applicant's Deadline 6 Submission – **Applicant's Post Hearing Submission-Issue Specific Hearing 7 (ISH7), Appendix B [REP6-065]**, shows the LBC LCWIP schemes in the context of the proposed off-site highway improvements. The LCWIP gives suggestions on the type of cycle routes that could be provided on the road corridors, but these proposals would be subject to detailed design work and could be changed.
- 3.2.9 The North Hertfordshire District Council (NHDC) LCWIP (Ref 4) shows improvements within the centre of Hitchin but does not propose any cycle improvements in the vicinity of the three off-site highway mitigation junctions, or along the roads which the mitigated junctions are located on.
- 3.2.10 In summary, with the exception of Wigmore Lane and the A1081 New Airport Way junctions with Gipsy Lane and London Road, there are no existing cycle routes/facilities at or connecting with the junctions that are the subject of off-site highway improvements as part of the Proposed Development in Luton, Hitchin and Central Bedfordshire. Cycle facilities are therefore not proposed at junctions where there are no existing cycle facilities, as there is little value, as stated in LTN 1/20. Nevertheless, the off-site highway mitigation does generally have the flexibility to incorporate cycle facilities on routes identified in the LBC LCWIP but until these routes are designed in detail, the nature of the improvements that might be required at the junctions is not definitive.

- 3.2.11 The next section provides details of:
- a. the walking and cycling provision for the proposed off-site improvements at the A1081 New Airport Way junctions with Gypsy Lane and London Road, where there is an existing cycle route; and
 - b. the walking and cycling provision that could be provided at the off-site highway improvement locations where the LBC LCWIP routes intersect with the proposed junction improvements.

3.2.12 The next section also sets out specifically where the LTN 1/20 guidance could and could not be achieved.

3.2.13 Note: the walking and cycling facilities provided on the Wigmore Lane corridor and associated junctions were covered in the **Applicant’s Response to Issue Specific Hearing 7 (ISH7) Actions 13 and 14 - Needs of Non-Motorised Users [REP7-073]** document.

3.3 Walking and Cycling Provision

A1081 New Airport Way junctions

3.3.1 Table 3.1 shows the walking and cycling provision included in the proposed off-site highway improvements at the A1081 New Airport Way junctions with Gypsy Lane and London Road, where there is an existing cycle route, and indicates whether this would achieve the guidance in LTN 1/20.

Table 3.1: Proposed walking and cycling improvements at A1081 New Airport Way junctions

Junction	Further details	LTN 1/20
A1081 New Airport Way / Gypsy Lane	The improvements to the junction retain the existing on-road cycle lane as it continues along the A1081 in both directions.	N/A as the existing on-road cycle lanes are retained
A1081 New Airport Way / London Road (North)	The improvements to the junction would retain the existing off-road pedestrian/cycle route around the junction and where signals are provided on Newlands Road and the A1081 entry, Toucan crossings would be provided although usage is expected to be extremely low.	The cycle route width would be retained as existing and crossings would be upgraded which would accord with the guidance

Junction	Further details	LTN 1/20
A1081 New Airport Way / London Road (South)	The proposed improvements do not affect the existing off-road pedestrian/cycle route on London Road, which is retained as existing.	N/A as the existing off-road cycle route is retained

LBC LCWIP routes

3.3.2 Table 3.2 shows the walking and cycling provision that could be provided at the off-site highway improvement locations where the LBC LCWIP routes intersect with the proposed junction improvements and indicates whether this would achieve the guidance in LTN1/20.

Table 3.2: Potential improvements to walking and cycling at off-site locations to suit LBC LCWIP

Junction	Further details	LTN 1/20
Windmill Road / Kimpton Road	The proposed improvements to the junction incorporate signalised pedestrian crossings, which could be upgraded to Toucan crossings facilitating a connection between the proposed LBC LCWIP routes J and R at detailed design stage.	The provision of Toucan crossings would accord with the guidance
A1081 New Airport Way / Kimpton Road / Vauxhall Way	The proposed design of the junction which forms part of the Vauxhall Way dual carriageway works being undertaken by LBC includes a segregated cycleway along the east side of Vauxhall Way, with Toucan crossings across Kimpton Road and the northern arm of Vauxhall Way. The junction intersects LBC LCWIP routes J and L.	The provision of Toucan crossings would accord with the guidance
Eaton Green Road / Lalleford Road	LBC LCWIP route J proposes an off-road route on the south side of Eaton Green Road and the proposed improvements to the junction would not affect route J. The proposed signalised pedestrian crossings could however be upgraded to Toucan crossings if required at detailed design stage.	N/A as the LCWIP route would be unaffected by the proposals
Windmill Road / St. Mary's Road / Crawley Green Road	The proposed improvements to the junction do not include new pedestrian facilities as vulnerable road user crossing movements are segregated from traffic via subways. The LBC LCWIP promotes a segregated off-road cycle track around the periphery of the junction	N/A as the LCWIP route would be unaffected by the proposals

Junction	Further details	LTN 1/20
	- route K1 - which the junction mitigation proposals would not affect.	
Crawley Green Road / Lalleford Road	The proposed improvements to the junction incorporate signalised pedestrian crossings, which could be upgraded to Toucan crossings along the proposed route of LBC LCWIP route Q at detailed design stage.	The provision of Toucan crossings would accord with the guidance
Eaton Green Road / Frank Lester Way	The proposed improvements to the junction incorporate signalised pedestrian crossings, which could be upgraded to Toucan crossings along the proposed route of LBC LCWIP route J at detailed design stage, with the potential to incorporate footway widening as required to accommodate the proposed cycle route.	The provision of Toucan crossings would accord with the guidance
A505 Vauxhall Way / Eaton Green Road	The proposed design of the junction which forms part of the Vauxhall Way dual carriageway works being undertaken by LBC includes a segregated cycleway along the east side of Vauxhall Way, with Toucan crossings connecting to Eaton Green Road. The junction intersects LBC LCWIP routes J and L.	The provision of Toucan crossings would accord with the guidance
Airport Access Road (AAR) and Eaton Road Link	The AAR alignment includes a 3m wide shared off-road pedestrian and cycle route between Provost Way and the proposed Terminal 2, with Toucan crossings provided at the signalised junctions along its length. The Eaton Green Road Link provides a continuation of the 3m wide shared off-road route to Eaton Green Road with Toucan crossings at the junction with Eaton Green Road.	The provision of a 3m wide shared off-road route and toucan crossings would accord with the guidance
A1081 New Airport Way / Percival Way	The proposed AAR and works to the junction between A1081 New Airport Way and Percival Way would lead to a reduction in traffic on Percival Way, improving the environment for cyclists on LBC LCWIP route J which travels along Percival Way.	The downgrading of an existing road and reduction of traffic volumes would accord with the guidance for

Junction	Further details	LTN 1/20
		an on-road cycle route.

3.3.3 Note: there is also the potential to include Advanced Stop Lines (ASLs) to assist on-road cycle movements through the proposed signalised junctions, if determined to be appropriate at detailed design stage. This would be consistent with LTN 1/20 for on-road cycle routes.

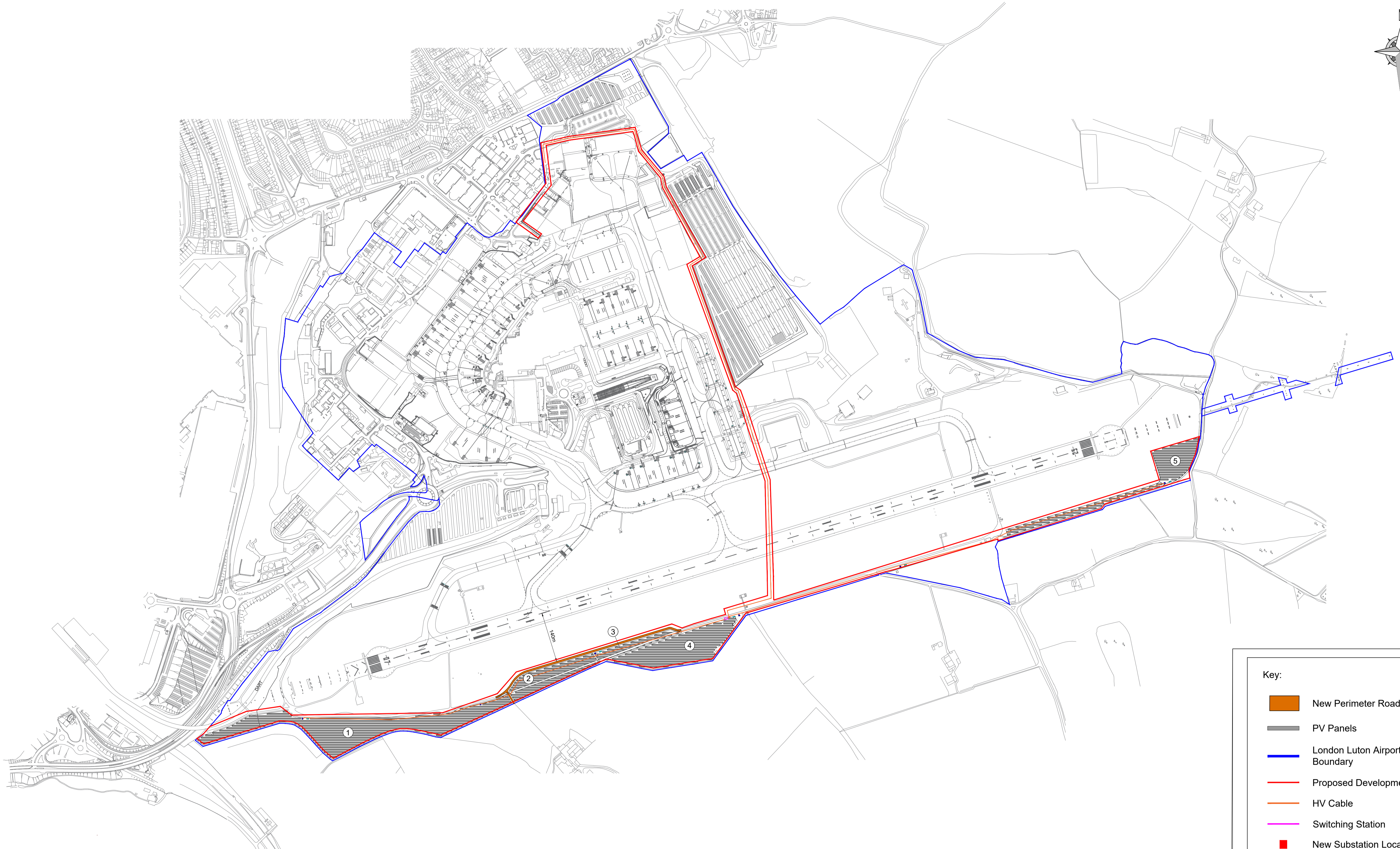
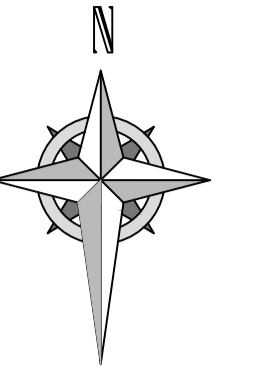
3.4 Summary and Conclusion

3.4.1 The proposed off-site highway mitigation provides improved walking and cycling facilities where appropriate, and generally in accordance with the principles of LTN 1/20.

3.4.2 The proposed off-site junction improvements do not preclude the cycle route proposals contained in the LBC LCWIP, and the proposed signalised pedestrian crossings can be upgraded to Toucan crossings to connect the LBC proposed off-road cycle routes at detailed design stage. Where signalised junctions are proposed as off-site mitigation, there is also the potential for ASLs to be provided for on-road cyclists at detailed design stage.

3.4.3 The junction designs remain at an outline stage of development, and the Applicant would work with the local authorities to develop the junction proposals at the detailed design stage, including walking and cycling facilities to tie in with the LCWIP schemes.

APPENDIX A SITE LAYOUT PLAN



SCALE BAR 1:5000



Key:	
	New Perimeter Road Layout
	PV Panels
	London Luton Airport Ownership Boundary
	Proposed Development Site
	HV Cable
	Switching Station
	New Substation Location
	New Battery Energy Storage System Location



Rev	Date	Revision Note

Project Title:	LONDON LUTON AIRPORT PROPOSED NEW SOLAR INSTALLATION PROJECT
Drawing Title:	SITE LAYOUT

Status:	GPDO CONSULTATION		
Scale @A1:	Date Created:	Sheet:	
1:5000	27/09/2023	1 of 1	
Drawing Number:	Revision:		
LA/22223/17	001		

GLOSSARY AND ABBREVIATIONS

Term	Definition
The Applicant	Luton Rising (a trading name for London Luton Airport Limited) the owners of London Luton Airport
BESS	Battery Energy Storage Systems
CBC	Central Bedfordshire Council
ES	Environmental Statement
ExA	Examining Authority
FTG	Fire Training Ground
LLAOL	London Luton Airport Operations Limited
LBC	Luton Borough Council
LV	Low voltage
PV	Photovoltaic
RPG	Registered Park and Garden

REFERENCES

Ref 1 Local Transport Note 1/20, 2020, Department for Transport

Ref 2 National Planning Policy Framework, December 2023, Department for Levelling Up, Housing and Communities

Ref 3 Luton Borough Council 'Local Cycling and Walking Infrastructure Plan', 2023, Luton Borough Council

Ref 4 North Hertfordshire District Council 'Local Cycling and Walking Infrastructure Plan', August 2023, NHDC / WSP